

No. 25-1002

In the

**United States Court of Appeals
for the District of Columbia Circuit**

FRONTIER AIRLINES, INC.,

Petitioner,

v.

UNITED STATES DEPARTMENT OF TRANSPORTATION,

Respondent,

ALASKA AIRLINES, INC.,

Intervenor.

On Petition for Review of a Final Order of the
United States Department of Transportation

**ALASKA AIRLINES, INC.'S RESPONSE IN OPPOSITION TO
FRONTIER AIRLINES' EMERGENCY MOTION TO STAY THE
DEPARTMENT OF TRANSPORTATION'S FINAL ORDER AND TO
EXPEDITE REVIEW**

Shay Dvoretzky

Counsel of Record

Parker Rider-Longmaid

Steven Marcus

SKADDEN, ARPS, SLATE,

MEAGHER & FLOM LLP

1440 New York Ave., NW

Washington, DC 20005

Telephone: 202-371-7000

shay.dvoretzky@skadden.com

Sarah Leitner

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
One Manhattan West
New York, NY 10001

Counsel for Intervenor Alaska Airlines, Inc.

CERTIFICATE AS TO PARTIES, RULINGS, AND RELATED CASES

In accordance with D.C. Circuit Rule 28(a)(1), Intervenor Alaska Airlines, Inc., hereby submits its Certificate as to Parties, Rulings, and Related Cases:

I. Parties

Petitioner is Frontier Airlines, Inc. Respondent is the United States Department of Transportation. On January 27, 2025, the Court granted the motion of Alaska Airlines, Inc., to intervene in support of Respondent. There are no amici before this Court at this time.

II. Rulings under review

Frontier Airlines, Inc., seeks review of Department of Transportation Final Order 2024-12-8 (Dec. 17, 2024), DOT-OST-2024-0065-23605.

III. Related cases

This case has not previously been before this Court or any other court. Intervenor Alaska Airlines, Inc., is not aware of any related cases currently pending in this Court or any other court within the meaning of D.C. Circuit Rule 28(a)(1)(C).

Dated: January 27, 2025

Respectfully submitted,

/s/ Shay Dvoretzky

Shay Dvoretzky

SKADDEN, ARPS, SLATE,

MEAGHER & FLOM LLP

1440 New York Ave., NW

Washington, DC 20005

202-371-7000

shay.dvoretzky@skadden.com

Counsel for Intervenor

Alaska Airlines, Inc.

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GLOSSARY

1994 Act	Federal Aviation Administration Reauthorization Act of 1994, Pub. L. No. 103-305, 108 Stat. 1569
2024 Act	FAA Reauthorization Act of 2024, Pub. L. No. 118-63, 138 Stat. 1025
Alaska	Alaska Airlines, Inc.
American	American Airlines, Inc.
DCA	Ronald Reagan Washington National Airport
DOJ	Department of Justice
DOT	Department of Transportation
FAA	Federal Aviation Administration
Frontier	Frontier Airlines, Inc.
SAN	San Diego International Airport
SJU	Luis Muñoz Marín International Airport in San Juan, Puerto Rico
Southwest	Southwest Airlines Co.

INTRODUCTION

In June 2024, the Department of Transportation (DOT) tentatively determined that Alaska Airlines, not Frontier Airlines, qualified for two “slot exemptions” – special congressionally created takeoff and landing rights – at Ronald Reagan Washington National Airport (DCA). On December 17, 2024, after rounds of comments, DOT finalized its finding that Alaska qualified for the slot exemptions and Frontier did not. DOT authorized Alaska to begin operating in March 2025 the only nonstop roundtrip service between DCA and San Diego International Airport (SAN), and rejected Frontier’s application to operate flights between DCA and Luis Muñoz Marín International Airport in San Juan, Puerto Rico (SJU). Frontier did not ask DOT for a stay. Alaska began selling tickets for DCA-SAN service.

On January 17, 2025, a full month after DOT’s final decision, Frontier asked this Court to entertain its request for an “emergency” stay. Frontier wants to stop Alaska from operating the only nonstop DCA-SAN service, which would fulfill Congress’s express objectives of promoting competition and traveler choice, and force Alaska to cancel more than 1,600 tickets. The Court should deny Frontier’s motion. There is no emergency, and Frontier cannot satisfy the stay factors anyway.

1. Under Federal Rule of Appellate Procedure 18(a)(1), Frontier had to seek a stay from DOT before asking this Court. It does not matter that DOT had rejected Frontier's merits arguments – that is *always* true when a party seeks a stay. The proper procedure allows agencies to address the kinds of concerns Frontier now dilatorily insists create an emergency for this Court. The Court should deny Frontier's motion for this reason alone.

2. A stay is not warranted under the traditional stay factors. *First*, Frontier's merits arguments are wrong. DOT correctly concluded that Alaska, and not Frontier, qualified for the slot exemptions based on careful interpretation of the statutory scheme. To be eligible, an airline must be a limited incumbent carrier: it must have slots (takeoff and landing rights different from slot exemptions as defined in the statute and discussed below), but fewer than 40. Alaska satisfies that test with its eight DCA slots; Frontier, with zero slots, does not, because it is not an incumbent as to slots. Nor does Alaska have a disqualifying code-share agreement, because a court order prohibits it from displaying American Airlines' code on any Alaska flights at DCA. *Second*, a stay would not address most of Frontier's claimed irreparable harm – the inability to operate its own route – because a stay would not authorize that route. *Third*, a stay would harm Alaska and travelers alike –

by orders of magnitude more—by limiting competition and traveler choice and forcing Alaska to lose millions in ticket refunds and reversing preparations for DCA-SAN service. *Fourth*, a stay would thus also undermine the congressionally identified public interest in promoting competition and traveler choice. The Court should deny Frontier’s motion.

STATEMENT

A. The Federal Aviation Administration limits flights to reduce delays at congested airports.

In 1968, the FAA issued a rule, *High Density Traffic Airports*, 33 Fed. Reg. 17,896 (Dec. 3, 1968), to address delays at congested airports, including DCA. The rule restricts the number of flights by allocating airlines limited numbers of takeoff and landing “slots.” *Id.* A slot is a right to conduct one takeoff or landing. 49 U.S.C. § 41714(h)(4).

Although they addressed congestion, slot limits suppressed flight options. So in 1994, Congress allowed DOT to grant exemptions from slot limits—or “slot exemptions”—in limited circumstances to eligible air carriers. *See Republic Airline Inc. v. United States Department of Transportation*, 669 F.3d 296, 297 (D.C. Cir. 2012) (citing FAA Reauthorization Act of 1994

(1994 Act), Pub. L. No. 103-305, § 206, 108 Stat. 1569, 1584). Like a slot, a slot exemption is a right to conduct one takeoff or landing. *Id.*

To allocate slot exemptions, the 1994 legislation introduced the terms “new entrant air carrier” and “limited incumbent carrier.” 1994 Act, § 206(a)(1), 108 Stat. at 1587. Congress defined “new entrant air carrier” as including both an “air carrier that does not hold a slot at the airport,” as well as a carrier qualifying as a “limited incumbent carrier.” *Id.* Congress defined “limited incumbent carrier,” in turn, by incorporating the definition then in 14 C.F.R. § 93.213(a)(5)—a carrier that “holds or operates fewer than 12 air carrier or commuter slots, in any combination, at a particular airport.” 1994 Act, § 206(a)(1), 108 Stat. at 1587. In 2012, Congress amended that definition. FAA Modernization and Reform Act of 2012, Pub. L. No. 112-95, § 414(a), 126 Stat. 11, 92. The 2012 definition incorporated the regulatory definition, while specifying that “slots” shall not include “slot exemptions.” *Id.*

The current definitions are largely the same. A “new entrant air carrier” means a carrier “that does not hold a slot at the airport concerned,” or “a limited incumbent carrier.” 49 U.S.C. § 41714(h)(3). And a “limited incumbent air carrier” is a carrier that operates fewer than 40 slots at an airport, not including slot exemptions. *Id.* § 41714(h)(5).

B. Congress adds ten slot exemptions at DCA in the FAA Reauthorization Act of 2024.

In 2024, Congress enacted the FAA Reauthorization Act of 2024 (2024 Act), Pub. L. No. 118-63, 138 Stat. 1025. The law requires DOT to grant ten slot exemptions at DCA, creating five new roundtrip flights between DCA and domestic airports. 49 U.S.C. § 41718(i)(1).

The law sets eligibility requirements for the slot exemptions. Eight exemptions must go to “incumbent air carriers qualifying for status as a non-limited incumbent carrier at [DCA].” *Id.* § 41718(i)(2). The other two exemptions must go to “incumbent air carriers qualifying for status as a limited incumbent carrier at [DCA].” *Id.* § 41718(i)(3). Congress did not allocate any exemptions to “new entrant air carriers.” Congress required DOT to consider, in awarding the exemptions, whether granting the exemptions will enhance service to airports currently lacking nonstop service to DCA, and whether the exemptions will positively affect competition among carriers. *Id.* § 41718(i)(4)(B).

C. DOT requests applications while noting that Alaska is a qualifying limited incumbent carrier, and Alaska and Frontier apply for the two limited incumbent slot exemptions.

To implement the 2024 Act, DOT requested applications for the slot exemptions from eligible airlines. *See* Frontier Emergency Mot., Ex. E. DOT identified two carriers as limited incumbents (Alaska and Air Canada). DOT required applicants to propose the “aircraft type, a schedule showing proposed times, [and] an approximate start-up date.” *Id.* at 3.

Alaska applied for the two limited incumbent slot exemptions and proposed operating nonstop roundtrip service between DCA and SAN—a service no carrier currently offers. SA8-SA190 (Alaska Application). Alaska explained that the route would provide a “valuable new option for the large volume of U.S. government (including military) travelers between Washington, DC, and San Diego, which is home to the nation’s largest military community.” SA12. San Diego is “by far the U.S. airport with the greatest number of passengers without nonstop service to DCA”; the government estimates that over 32,000 government personnel (military and civilian) would travel between DCA and SAN in 2025. SA13.

Frontier also applied for the limited incumbent slot exemptions even though DOT had not determined that Frontier was a limited incumbent.

Frontier Emergency Mot., Ex. F. Frontier proposed operating roundtrip service between DCA and SJU, a route JetBlue already serves. *Id.* at 5-6. Despite DOT's instructions, Frontier did not include the aircraft type, a proposed schedule, or an approximate start-up date.

In comments, Alaska agreed that Frontier was ineligible. *See* SA192-SA207 (Alaska Comments). Alaska also noted that Frontier failed to provide the information required by DOT. SA196 n.17.

Frontier submitted comments challenging Alaska's eligibility. Frontier contended that Alaska's code-share agreement with American Airlines required aggregating American's and Alaska's slots under 49 U.S.C. § 41714(k), putting Alaska over the cap for limited incumbent slot exemptions, so Alaska would need to apply for the eight non-limited incumbent slot exemptions instead. SA212-SA213 (Frontier Comments).

D. DOT tentatively finds that Alaska merits the limited incumbent slot exemptions and that Frontier is ineligible for those exemptions.

After reviewing the applications, DOT issued an Order to Show Cause announcing its tentative determinations. Frontier Emergency Mot., Ex. H (Show Cause Order), at 1-2. DOT proposed awarding Alaska slot exemptions for its proposed DCA-SAN service. *Id.* at 21-24. DOT also

determined that Frontier is ineligible for slot exemptions because it is neither a limited nor a non-limited incumbent carrier. *Id.* at 20.

DOT interpreted the language of the 2024 Act, 49 U.S.C. § 41718(i)(2), (3), to create a two-part eligibility test. *First*, DOT explained, the carrier must be an “incumbent,” meaning a carrier that “was engaged in air transportation at DCA as of the enactment date of the FAA 2024 Act.” Show Cause Order 19. *Second*, the carrier must either be a limited incumbent air carrier (for two available slot exemptions) or a non-limited incumbent air carrier (for eight available slot exemptions). *Id.*

Applying that test, DOT tentatively determined that Frontier was ineligible. *Id.* at 20. DOT concluded that Frontier is an incumbent because it was “engaged in air transportation at DCA.” *Id.* But Frontier is not a limited incumbent carrier. *Id.* Congress defined limited incumbents based on the number of slots they held, and explicitly excluded slot exemptions. *Id.* (citing 49 U.S.C. § 41714(h)(5)(B)(i)). Frontier operates at DCA solely through slot exemptions (it has zero slots), so it met the definition of a “new entrant air carrier,” *id.* (citing 49 U.S.C. § 41714(h)(3)), not a limited incumbent carrier, and the 2024 Act did not allocate any slot exemptions to new entrants.

DOT next determined that Alaska is a limited incumbent carrier because it holds slots at DCA. *Id.* at 21-22. A settlement agreement with the Department of Justice prohibits Alaska from placing American's code on any flight Alaska operates at DCA. *Id.* Thus, § 41714(k)'s code-share provision does not apply, so Alaska's eligibility does not turn on aggregating American's and Alaska's slots. *Id.*

DOT concluded that Alaska merits the two limited incumbent slot exemptions to operate nonstop service between DCA and SAN. DOT observed that 139,000 passengers travel annually between DCA and SAN, with no option for nonstop service. *Id.* at 24. American and Southwest provide most of that service (Alaska carries "less than 1%" of those passengers), and the average fare for those connecting flights is "currently 30% higher than the average for DCA." *Id.* And Alaska "does not have a dominant presence at DCA, holding only approximately 2% of allocated slots." *Id.* DOT thus reasoned that granting the limited incumbent slot exemptions to Alaska would "provide a new, convenient flight option, and enhance competition by increasing the number of air carriers in the [DCA]-SAN market." *Id.*

E. After considering further comments, DOT issues a Final Order awarding Alaska the two limited incumbent slot exemptions for DCA-SAN service.

Frontier objected to DOT's tentative findings, challenging Alaska's eligibility and reiterating that it is an eligible limited incumbent because it has zero slots and "[zero] is less than forty." Emergency Mot., Ex. G, at 12.

Alaska filed comments explaining that Frontier is not a limited incumbent. SA218-SA232 (Alaska Answer). Limited incumbents must have between 1 and 39 slots: slot exemptions do not count, 49 U.S.C. § 41714(h)(5)(B)(i), and an airline without slots is not an incumbent as to slots. SA223-SA224. Frontier operates at DCA using only slot exemptions, and has zero slots, meaning it is a new entrant instead. *Id.* Alaska also explained that § 41714(k) is inapplicable because a settlement agreement with DOJ bars Alaska from displaying American's code on Alaska flights at DCA. SA224-SA227.

On December 17, 2024, DOT issued a Final Order adopting the Show Cause Order's tentative findings and again rejecting Frontier's arguments. Frontier Emergency Mot., Ex. I (Final Order), at 7-9. After allocating the ten slot exemptions, including the two limited incumbent exemptions to Alaska,

DOT noted that “[c]arriers are expected to inaugurate full service within 90 days.” *Id.* at 9.

F. Frontier fails to ask DOT for a stay, petitions this Court for review, and moves for emergency relief and expedited review a full month after DOT’s Final Order and three months after DOT’s Show Cause Order.

On January 3, 2025, Frontier filed a petition asking this Court to review the Final Order. Two weeks later—a month after the Final Order—Frontier filed its emergency motion, claiming it qualifies for the limited incumbent slot exemptions and seeking a stay of DOT’s award of the exemptions to Alaska. Frontier did not request a stay or any other interim relief from DOT, as required by Federal Rule of Appellate Procedure 18(a)(1). Frontier argues that this Court should stay the Final Order because it qualifies as a limited incumbent carrier and Alaska is not a limited incumbent carrier.

ARGUMENT

I. Frontier’s failure to ask DOT for a stay warrants denial of the stay that Frontier now seeks from this Court on an emergency basis after a month of delay.

Federal Rule of Appellate Procedure 18(a)(1) provides that “[a] petitioner must ordinarily move first before the agency for a stay pending review of its decision or order.” That requirement allows the agency to consider

providing the requested relief, including something as simple as delaying an action's effective date, before the parties involve the courts.

Having failed to follow the rules in favor of bringing a dilatory emergency motion before this Court, Frontier claims (Mot. 9 n.17) that "moving first before the agency would be impracticable." Fed. R. App. P. 18(a)(2). But impracticability ordinarily occurs when "it would be futile to ask the agency to stay the order in question because the agency lacks power to do so."

Charles A. Wright & Arthur R. Miller, *Federal Practice and Procedure* § 3964 (5th ed. updated June 2024). In *Sofinet v. INS*, 188 F.3d 703, 706-07 (7th Cir. 1999), for instance, the court excused failure to seek a stay from the immigration agency where the agency lacked authority to grant stays.

DOT, in contrast, has authority to stay the Final Rule. Under the Administrative Procedure Act, when DOT finds that "justice so requires, it may postpone the effective date of action taken by it, pending judicial review." 5 U.S.C. § 705. Frontier could and should have asked DOT for a stay. The Final Order expects airlines to begin offering their flights in 90 days; Alaska's DCA-SAN service will begin on March 17, 2025. Frontier has had ample time to ask DOT for a stay and then, if necessary, head to court. Instead, Frontier

spent a month watching Alaska sell tickets and make investments in its new route, SA3-SA6 ¶¶ 7, 12-14, before claiming an “emergency” in this Court.

Frontier suggests that seeking a stay would have been “impracticable” because DOT had previously rejected “many of [its] arguments.” Emergency Mot. 9 n.17. On that logic, a party would *never* have to follow Rule 18. After all, stays are for *losing* parties. Even so, Rule 18 requires asking the agency first, to give it a chance to determine whether, despite its merits determination, “justice so requires” interim relief such as a delayed effective date, 5 U.S.C. § 705. But Frontier never gave DOT a chance. Frontier could have tried to persuade DOT to stay the Final Order so that Alaska would not start selling tickets, and the agency could have considered the relative equities and harms in making that assessment. Instead, by circumventing Rule 18 and filing a dilatory “emergency” motion, Frontier has asked this Court to upset numerous settled expectations, to the detriment of Alaska and all the passengers who have already purchased tickets, as explained further below (at 24).

II. Frontier cannot satisfy the stay factors and show that it warrants such extraordinary relief anyway.

Frontier's failure to seek a stay from DOT aside, Frontier cannot satisfy the traditional stay factors. A stay pending review "is an 'extraordinary' remedy." *KalshiEx LLC v. CFTC*, 119 F.4th 58, 63 (D.C. Cir. 2024). Frontier must show (1) "a strong showing that [it] is likely to succeed on the merits"; (2) that it "will be irreparably injured absent a stay"; (3) that a stay will not "substantially injure the other parties interested in the proceeding"; and (4) that the "public interest" favors a stay. *Nken v. Holder*, 556 U.S. 418, 434 (2009). Frontier cannot make that showing.

A. Frontier is wrong on the merits.

Frontier cannot succeed on the merits. *First*, Frontier is not a limited incumbent carrier because it has zero slots at DCA and is thus a new entrant ineligible for the limited incumbent slot exemptions. Congress defined limited incumbent status by reference only to slots, expressly carving out slot exemptions; Congress also created a separate category of new entrant carriers. A carrier with zero slots, like Frontier, cannot be an incumbent because an incumbent is an entity that currently has the position in question; a carrier with zero slots has no slot status. Frontier's contrary argument would make

all new entrants (which have zero slots) limited incumbents, collapsing the separate categories Congress created and leaving new entrant status no work to do.

Second, Alaska is a limited incumbent because it has eight slots at DCA. Frontier's invocation of § 41714(k)'s code-share provision fails because the question is whether the applicant displays another airline's codes on its flights, and Alaska does not display American's codes on its DCA flights (indeed, a court order bars it from doing so).

1. Frontier is not a limited incumbent carrier at DCA because it has zero slots, and an airline with zero slots cannot be a "limited incumbent" as to slots.

a. Congress has created three categories of air carriers: new entrants, limited incumbents, and non-limited incumbents. *See* 49 U.S.C. §§ 41714(h), 41718(i)(2), (3). A "new entrant air carrier" "means an air carrier that does not hold a slot at the airport concerned" or "a limited incumbent carrier." *Id.* § 41714(h)(3). A "limited incumbent carrier," in turn, "means an air carrier or commuter operator that holds or operates fewer than [40] air carrier or commuter slots, in any combination, at a particular airport." 14 C.F.R. § 93.213(a)(5); *see* § 41714(h)(5)(A) (incorporating regulatory definition but specifying 40 slots). By statute, "the term 'slot' shall not include ...

‘slot exemptions.’’ *Id.* § 41714(h)(5)(B)(i). Thus, while all limited incumbent carriers are also considered as new entrants, not all new entrants are limited incumbent air carriers. Finally, although Congress did not define “non-limited incumbent carrier,” all agree that the term means an air carrier with more than 40 slots at the airport. *See* Frontier Emergency Mot. 3. n.3.

b. Frontier’s eligibility argument hangs on the notion that a carrier with zero slots at an airport is a limited incumbent because zero slots is “fewer than [40] … slots.” 14 C.F.R. § 93.213(a)(5). That is wrong for three reasons.

First, a limited incumbent must be *an incumbent*. An incumbent is “one that occupies a particular position or place.” *Incumbent*, Merriam-Webster, <https://www.merriam-webster.com/dictionary/incumbent>. The particular positions or places, § 41714(h)(5) makes clear, are “slots … at a particular airport,” 14 C.F.R. § 93.213(a)(5), but *not* slot exemptions, *see* 49 U.S.C. § 41714(h)(5)(A), (B)(i). Simply put, a carrier cannot be an incumbent with respect to slots unless it has at least *one* slot. Frontier reads “incumbent” out of the definition, failing to “ensure[] that the term … carries meaning, as each word in a statute should.” *Ransom v. FIA Card Services, N.A.*, 562 U.S. 61, 70 (2011). And reading “fewer” to exclude zero is natural in the context of

holding or having a specified thing, as here. Someone who says they “have fewer kids than Justice Barrett” would arguably mislead the listener if they had no kids.

Second, counting carriers with zero slots as limited incumbents would erase the distinction Congress drew in § 41714 between limited incumbents and new entrants. Congress defined “new entrant air carrier[s]” to include carriers that “do[] not hold a slot” *and* limited incumbent carriers. *Id.* § 41714(h)(3). If a limited incumbent carrier also included a carrier with zero slots, the new entrant category would be superfluous. So would Congress’ specification of limited incumbents after already identifying carriers that do not hold a slot. That reading would violate the “cardinal principle of interpretation” that the Court must “construe a statute so that no provision is rendered inoperative or superfluous, void[,] or insignificant.” *Asiana Airlines v. FAA*, 134 F.3d 393, 398 (D.C. Cir. 1998) (quotation omitted).

Third, equating new entrant and limited incumbent status would make little sense given the statutory scheme. For instance, Congress required DOT to award 24 slot exemptions at DCA if it found that the exemptions would “increase competition by new entrant air carriers.” 49 U.S.C. § 41718(a)(2). In 2012, Congress authorized 16 slot exemptions at DCA, and required that

eight slots go “to limited incumbent air carriers *or* new entrant air carriers (as such terms are defined in section 41714(h)).” 49 U.S.C. § 41718(g)(2). Congress’s use of both terms makes clear that the terms have different meanings.

c. Frontier is a new entrant air carrier at DCA, not a limited incumbent. Frontier holds zero slots at DCA. Frontier Emergency Mot. 13. It thus cannot qualify as an incumbent as to slots.

d. Frontier’s counterarguments lack merit.

First, Frontier argues that it qualifies as a limited incumbent because the definition of “incumbent” must refer not just to slots but slot exemptions, and it has several slot exemptions. Frontier points to the 2024 Act’s directive to DOT to “make 8 [slot exemptions] available to incumbent air carriers qualifying for status as a non-limited incumbent carrier at” DCA. 49 U.S.C. § 41718(i)(2). In Frontier’s view, the first “incumbent” must refer to offering *any* flights at DCA (even through slot exemptions), and the word “incumbent” must mean the same thing in “limited incumbent,” so an airline can be a limited incumbent where it holds zero slots but nonetheless flies.

That argument fails. Even assuming the first “incumbent” encompasses slot exemptions, Congress specifically provided that, “for purposes of” the “limited incumbent” definition, slots “shall not include ...

‘slot exemptions.’’ *Id.* § 41714(h)(5)(B)(i). So if Frontier is right that incumbency *usually* looks to slot exemptions, then the Court must likewise interpret limited incumbency to follow a different rule, because it must presume “that Congress acts intentionally and purposely when it includes particular language in one section of a statute but omits it in another.” *Intel Corp. Investment Policy Committee v. Sulyma*, 589 U.S. 178, 186 (2020).

Second, Frontier says it “may *never* qualify for DCA slot exemptions” because it has slot exemptions and is not a “new entrant.” Emergency Mot. 12-13. For one thing, the new entrant definition, as noted, incorporates the limited incumbent definition, and thus likely also incorporates the limited incumbent definition’s exclusion of slot exemptions from slots. Thus, Frontier is a new entrant even though it has slot exemptions. For another, even if Frontier were not a new entrant, that would not make its interpretation of the limited incumbent definition correct. There is no indication that Congress intended to encompass *all* air carriers in 49 U.S.C. § 41714(h). Indeed, as originally enacted, the statute contained only two categories (new entrant air carriers and limited incumbent carriers). 1994 Act, § 206(a)(1), 108 Stat. at 1587. Congress later authorized slot exemptions for carriers outside those categories, including here – namely, non-limited incumbents. See 49 U.S.C.

§ 41718(i). Frontier attributes to Congress a purpose to cover all carriers, but statutory text and history belie such a purpose.

Finally, Frontier argues that DOT previously characterized it as a limited incumbent. Emergency Mot. 14. But there (unlike here) Congress authorized DOT to award slot exemptions to limited incumbents *or* new entrant carriers, meaning there was no reason to scrutinize the distinction. *See id.*, Ex. D, at 3 n.7. Anyway, DOT's prior interpretation does not matter, because Frontier's status is a legal question for the Court. *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369, 391-92, 412-13 (2024).

2. Alaska is a limited incumbent carrier because it holds fewer than 40 slots at DCA.

a. Alaska is a limited incumbent because it holds eight slots at DCA. SA2 ¶ 5.

b. Frontier claims that Alaska is not a limited incumbent because it has a code-share agreement with American that puts it over the 20-slot limit in § 41714(k). That argument fails.

i. Congress provided a special rule for an airline that "has or enters into a code-share agreement" with another air carrier: the airline cannot qualify for exemptions as a limited incumbent "if the total number of slots

and slot exemptions held by the two carriers at the airport exceed[s] 20." 49 U.S.C. § 41714(k). Congress did not define "code-share agreement." But the phrase is an industry term of art, and "technical terms of art should be interpreted by reference to the trade or industry to which they apply." *Louisiana Public Service Commission v. FCC*, 476 U.S. 355, 357 (1986). Generally speaking, a code-share agreement "means a contract between two airlines that allows them to market one another's flights by placing their respective unique, identifying codes on those flights." *United States v. Alaska Air Group, Inc.*, No. 16-cv-2377, 2017 WL 3674773, at *2 (D.D.C. June 23, 2017).

Here, context shows that "code-share agreement" must be understood by reference to the airline that is "operat[ing]" and is seeking to "qualify for a new ... slot exemption." 49 U.S.C. § 41714(k). That carrier has a code-share agreement if it agrees to display another carrier's code on its flight. As DOT explained, not counting aggregate slots in that instance would allow major carriers to game the system by using regional affiliates to obtain limited-incumbent slot exemptions but then display their code on those flights and control those flights and their marketing. Final Order 8 & n.22. As then-Senate Commerce Committee Chair John McCain explained, "[a] major airline should not be allowed to game the system and add to its hundreds of daily

slots through its commuter affiliates and codeshare partners.” 145 Cong. Rec. S12096 (Oct. 6, 1999). If the applicant invoking limited-incumbent status does not agree to display another carrier’s code on its flights, in contrast, those concerns do not exist and the applicant has no “code-share agreement” under § 41714(k).

ii. Alaska does not have a “code-share agreement” at DCA with American. As DOT recognized, while Alaska and American have a code-share relationship at other airports, they do not have a “code-share agreement” under § 41714(k) at DCA. Under the terms of a 2017 settlement related to Alaska’s merger with Virgin American Airlines, Alaska cannot place American codes on any flights Alaska operates at DCA. *See Alaska Air Group*, 2017 WL 3674773, at *2-3; Show Cause Order 22; Final Order 8-9 & n.22. The airlines thus do not have an agreement to place codes on each other’s flights. Alaska, as the limited incumbent applicant, does not display American’s code, and the Alaska-American relationship “does not place Alaska-operated slots under the marketing control of American.” Final Order 8-9.

B. Frontier's irreparable harm arguments are unpersuasive, and the substantial harm that a stay would inflict on Alaska dwarfs Frontier's assertions.

1. Frontier has not shown "certain and great," "actual and not theoretical," irreparable harm, *KalshiEx*, 119 F.4th at 64, or that "the absence of a stay" will cause it "irreparable harm," *Wisconsin Gas Co. v. FERC*, 758 F.2d 669, 674 (D.C. Cir. 1985). And the weight of the movant's irreparable harm is "greatly diminished" when a stay would "visit similar harm on other interested parties." *Ambach v. Bell*, 686 F.2d 974, 979 (D.C. Cir. 1982).

Frontier's monthlong delay in seeking a stay and failure to first ask DOT betray its irreparable harm argument. Indeed, Frontier will suffer its alleged injuries from being unable to operate its DCA-SJU route no matter whether a stay is granted because a stay will not authorize that service. A stay would only ground Alaska's DCA-SAN service, substantially harming Alaska and the thousands of passengers who have already bought tickets or may yet wish to fly that route. SA3-SA6 ¶ 8-14.

2. Frontier speculates (Emergency Mot. 19) that competition from Alaska will cost its indirect DCA-SAN service \$500,000. But "revenues and customers lost to competition which can be regained through competition are not irreparable." *Central & Southern Motor Freight Tariff Ass'n v. United*

States, 757 F.2d 301, 309, 244 (D.C. Cir. 1985) (per curiam). That increased competition *promotes* the public interest—and it is small compared to Alaska's if a stay issues.

A stay will cost Alaska over \$4 million. After Frontier failed to seek a stay from DOT, Alaska began selling DCA-SAN tickets. Alaska has sold 1,662 tickets and expects to sell 12,000 tickets before flights begin on March 17. SA3 ¶ 8. Alaska estimates annual revenue from the service at \$32 million. SA3 ¶ 9. A stay would cause Alaska significant financial injury, forcing it to refund or rebook ticketed customers. SA3-SA4 ¶ 10. Alaska will also suffer significant reputational harm from canceling those tickets, and lose future revenue from the service. New employees hired for the route would also be negatively affected, and Alaska would need to overcome serious logistical burdens to redeploy staff and aircraft across the country. SA4-SA5 ¶¶ 12-13. Those injuries dwarf Frontier's and warrant denying a stay. *Ambach*, 686 F.2d at 979.

C. The public interest does not support a stay.

A stay would harm the public interest. As DOT explained, nonstop DCA-SAN service will “enhance options” for 139,000 annual travelers and have a “positive impact on the overall level of competition.” Show Cause

Order 24. Indeed, Congress sought to “enhance options for nonstop travel to … airports that do not have nonstop service” and to improve competition. 49 U.S.C. § 41718(i)(4). A stay, in contrast, would mean fewer routes and higher prices for travelers, and travelers who booked tickets would need to rebook or seek refunds.

Frontier claims (Emergency Mot. 20) a stay serves the public interest by preventing vacatur (if Frontier prevails) from causing disruption. But Frontier’s inequitable delay means that Alaska has already sold more than 1,600 tickets, ensuring that *a stay* will cause disruption.

Frontier also says the public interest supports adding competition to the DCA-SJU route. But again, a stay would not let Frontier operate that route. It would only bar Alaska from competing by operating DCA-SAN service. Frontier observes that “the public interest is best served when competition is healthy,” Emergency Mot. 21, and that is exactly why its position lacks merit.

III. The Court should deny a stay without expediting review.

The Court should deny a stay, and with it, expedited review. Because Frontier identifies no statutory authority for expediting, it must show “strongly compelling” reasons why “the delay will cause irreparable injury,”

or the “public generally, … [has] an unusual interest in prompt disposition.” D.C. Cir. IOP VIII.B. For the reasons explained, Frontier lacks such compelling reasons, and it is unlikely to succeed on the merits. Thus, unless the Court nonetheless decides to enter a stay—the rare circumstance that would justify, and Alaska would request, expedition—this Court’s review should proceed in the ordinary course.

CONCLUSION

The Court should deny Frontier’s dilatory “emergency” motion.

Dated: January 27, 2025

Respectfully submitted,

/s/ Shay Dvoretzky

Shay Dvoretzky

Counsel of Record

Parker Rider-Longmaid

Steven Marcus

SKADDEN, ARPS, SLATE,

MEAGHER & FLOM LLP

1440 New York Ave., NW

Washington, DC 20005

Telephone: 202-371-7000

shay.dvoretzky@skadden.com

Sarah Leitner
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
One Manhattan West
New York, NY 10001

Counsel for Intervenor Alaska Airlines, Inc.

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(g), I hereby certify that this response complies with the type-volume limitation of Federal Rule of Appellate Procedure 27(d)(1) and (2) because, as calculated by Microsoft Word, it contains 5,193 words, excluding the parts of the response exempted by Federal Rule of Appellate Procedure 32(f) and Circuit Rule 32(e)(1). I also certify that this response complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type-style requirements of Federal Rule of Appellate Procedure 32(a)(6) because it has been prepared in a proportionally spaced typeface using Microsoft Word in a 14-point Book Antiqua font.

Dated: January 27, 2025

Respectfully submitted,

/s/ Shay Dvoretzky
Shay Dvoretzky
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
1440 New York Ave., NW
Washington, DC 20005
202-371-7000
shay.dvoretzky@skadden.com

*Counsel for Intervenor
Alaska Airlines, Inc.*

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Appellate Procedure 25(b) and Circuit Rule 25(f), I hereby certify that on January 27, 2025, I electronically filed the foregoing response and following Special Appendix with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and the CM/ECF system will accomplish service.

Dated: January 27, 2025

Respectfully submitted,

/s/ Shay Dvoretzky
Shay Dvoretzky
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
1440 New York Ave., NW
Washington, DC 20005
202-371-7000
shay.dvoretzky@skadden.com

*Counsel for Intervenor
Alaska Airlines, Inc.*

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**DECLARATION OF KIRSTEN AMRINE,
VICE PRESIDENT OF REVENUE MANAGEMENT AND NETWORK
PLANNING, ALASKA AIRLINES, INC. (JAN. 27, 2025)**

**DECLARATION OF KIRSTEN AMRINE IN SUPPORT OF
ALASKA AIRLINES, INC.'S RESPONSE IN OPPOSITION TO
FRONTIER AIRLINES' EMERGENCY MOTION TO STAY THE
DEPARTMENT OF TRANSPORTATION'S FINAL ORDER
AND TO EXPEDITE REVIEW**

I, Kirsten Amrine, hereby declare as follows:

1. I am over twenty-one years of age and am competent to testify to the matters set out below.
2. I am currently employed as Vice President of Revenue Management and Network Planning at Alaska Airlines, Inc.
3. The facts stated below are true and correct and are based on my personal knowledge, discussion with my colleagues at Alaska, or review of Alaska documents.
4. I understand that this Declaration is offered to support Alaska Airlines' response in opposition to Frontier Airlines, Inc.'s emergency motion to partially stay the Department of Transportation's (DOT) Final Order and for expedited consideration of the D.C. Circuit's review.
5. Alaska Airlines operates flights in and out of Ronald Reagan Washington National Airport (DCA). Alaska holds 8 slots at DCA, and before 2024 had been awarded 10 slot exemptions.

6. Imposing a stay on Alaska's plan, which is already well in motion, to offer direct service between DCA and San Diego International Airport (SAN) will cause Alaska and travelers irreparable injury.

7. On December 23, 2024, Alaska began selling tickets for daily nonstop flights between DCA and SAN. Those daily flights are scheduled to begin on March 17, 2025. Alaska began marketing DCA-SAN flights on December 23, 2024, because on December 17, 2024, DOT issued a final order awarding two slot exemptions to Alaska to operate this direct route to and from DCA.

8. As of January 27, 2025, Alaska has already booked 1,662 tickets to passengers on this route. By March 17, 2025, when the service is scheduled to begin, Alaska expects to sell more than 12,000 tickets, valued at near \$4 million, for travel between DCA and SAN.

9. Alaska expects that the DCA-SAN route will provide service to over 100,000 passengers each year and produce around \$32 million dollars in revenue annually from ticket sales.

10. If a stay impairs Alaska's ability to offer this route, Alaska will suffer significant financial harm, including lost revenue from ticket sales. If the route is canceled in February, the soonest that the aircraft reserved for

the DCA-SAN service could be redeployed is May 2025, meaning that if the DCA-SAN service is delayed or canceled, the aircraft will be grounded and out of service for at least 1.5 months. This grounding and subsequent abbreviated booking window for the capacity that is repurposed for May and beyond is estimated to cost the company over \$4 million in revenue. In addition, Alaska will also need to make alternative accommodations for passengers who choose to rebook their travel on an alternate route, or pay refunds to passengers who request them. Moreover, Alaska estimates that it would lose approximately \$400,000 on other flights by having to turn away other customers to rebook passengers whose DCA-SAN tickets would need to be canceled.

11. Alaska will also suffer reputational harm if it has to cancel tickets customers have already purchased, and disappoint potential future customers who are counting on Alaska to provide this service. Those customers may choose not to book with Alaska again out of fear that their flights might be canceled at the last minute. That will inflict incalculable reputational harm on Alaska.

12. Delaying or canceling DCA-SAN service will also impose significant operational costs on Alaska. To offer this route, Alaska had to

reallocate aircraft and crew from other routes. For March and April alone, Alaska has had to assign approximately \$1 million in wages for the DCA-SAN pilots and crew. If a stay were imposed in early February, 2025, Alaska would still be contractually bound to pay those wages whether or not Alaska is permitted to operate the route. In addition, redeploying the aircraft for May and beyond will be a material logistical undertaking that will cost Alaska staff time and will result in an inefficient use of Alaska's human and mechanical resources.

13. Delaying or canceling the planned DCA-SAN service will also hurt Alaska's employees. Alaska's DCA station has already hired four additional employees because of the new DCA-SAN route and is planning to hire an additional four in February. Delay or cancelation of the route will negatively affect Alaska's DCA station employees.

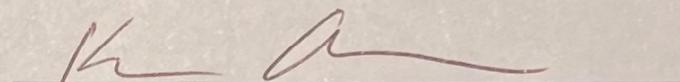
14. Finally, canceling the planned DCA-SAN service will harm not only Alaska, but also travelers who would have flown on the route. As it told the Department of Transportation, Alaska expects significant interest in the DCA-SAN flight, especially from military personnel due to San Diego's significant military presence and other government travelers given DCA's proximity to many federal agencies, as well as from the traveling public

(both business and leisure travelers). Travelers are already anticipating this direct route; again, Alaska has already sold 1,662 tickets as of January 27, 2025. Alaska expects that some travelers who have booked a flight for a vacation, to attend an event, for a life milestone, for a work trip, or for whatever reason simply will not rebook travel. Those passengers will be irreparably harmed by having their tickets canceled.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 27, 2025

Respectfully submitted,



Kirsten Amrine,
Vice President of Revenue
Management and Network Planning,
Alaska Airlines, Inc

**APPLICATION OF ALASKA AIRLINES, INC.,
FOR SLOT EXEMPTIONS (JULY 8, 2024), DOT-OST-2024-0065-5926**

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, DC**

Establishment of Slot Exemption Proceeding)
At Ronald Reagan Washington National Airport) Docket DOT-OST-2024-0065
Pursuant to 49 U.S.C. § 41718)
)

**APPLICATION OF ALASKA AIRLINES, INC.
FOR SLOT EXEMPTIONS
Washington, DC (DCA)–San Diego, CA (SAN)**

Communications with respect to this document should be addressed to:

Kyle Levine
Senior Vice President,
Legal & General Counsel

Cameron Cloar-Zavaleta
Deputy General Counsel
& Managing Director,
Litigation & Regulatory Law

ALASKA AIRLINES, INC.
19300 International Boulevard
Seattle, Washington 98188

David Heffernan
Michael Deutsch
COZEN O'CONNOR
1200 19th Street, NW
Washington, DC 20036
(202) 912-4800
dheffernan@cozen.com
mdeutsch@cozen.com

Counsel for
ALASKA AIRLINES, INC.

DATED: July 8, 2024

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**BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, DC**

Establishment of Slot Exemption Proceeding)	
At Ronald Reagan Washington National Airport)	Docket DOT-OST-2024-0065
Pursuant to 49 U.S.C. § 41718)	
)	

**APPLICATION OF ALASKA AIRLINES, INC.
FOR SLOT EXEMPTIONS
Washington, DC (DCA)–San Diego, CA (SAN)**

Alaska Airlines, Inc. (“Alaska”) hereby applies for two slot exemptions to operate daily nonstop roundtrip service between Ronald Reagan Washington National Airport (“DCA”) and San Diego International Airport (“SAN”).¹ No carrier operates such service today.

The need for nonstop service between DCA and SAN is compelling. San Diego is the eighth largest U.S. city, home to the nation’s largest military community, sits in the fifth largest U.S. county, and its airport, SAN, accounts for the greatest number of passengers of any U.S. airport outside the DCA perimeter without nonstop DCA service.²

Alaska, the nation’s premier West Coast-based airline, is renowned for its low fares, high-quality, award-winning service and operational excellence. Having served SAN for nearly 40 years, Alaska maintains San Diego as a focus city and has consistently grown its presence in this market, including opening its fifth flight attendant base there in 2013. With this strong history of commitment to the San Diego community, Alaska is the ideal carrier to bring nonstop

¹ This application responds to the Department’s Notice served June 24, 2024 in the above-captioned docket (the “Notice”). As the Department stated in the Notice, Alaska is eligible to apply for an allocation of two slot exemptions as a limited incumbent carrier. *See* Notice at 2.

² *See* Exhibit AS-1.

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DCA service to SAN. Since 2010, Alaska has expanded its services at SAN to include 38 destinations, with plans to continue to grow its presence and bring more convenient flight options to the traveling public. The addition of nonstop DCA service will enable Alaska to further expand its network at SAN and deliver greater competitive service options for both local SAN customers and many passengers connecting through the airport to/from destinations across the West Coast.

I. Alaska's DCA-SAN Service Proposal

Alaska will begin its proposed daily nonstop roundtrip DCA-SAN service within 90 days of its receipt of final slot times.³ Alaska's daily eastbound service will depart SAN at 8:30 a.m., arriving at DCA at 4:30 p.m. Its daily westbound service will depart DCA at 5:30 p.m., arriving at SAN at 7:50 p.m.⁴ Alaska will operate DCA-SAN service using either Boeing 737-800 or 737-8 MAX aircraft, each of which has 159 seats, configured with 12 First Class seats, 30 Premium Class seats, and 117 Main Cabin seats.⁵

With hubs in Anchorage, Seattle, Portland, San Francisco, and Los Angeles, Alaska is the nation's only airline based on and primarily serving the West Coast. Alaska is well positioned to serve the San Diego market from DCA, as demonstrated by its successful use of limited slot exemption allocations to successfully serve Seattle, Portland, San Francisco, and Los Angeles from DCA, as well as its longstanding commitment to grow its network and maintain a flight attendant base at SAN.

³ As DOT has stated, selected carriers will have to work with the FAA Slot Administration Office for the assignment of slot times. DOT will then issue a notice confirming allocation of final slot times for the granted exemptions. *See* Notice at 3.

⁴ *See* Exhibit AS-2. All times are local. In accordance with the Notice, Alaska will work with the FAA Slot Administration Office on the assignment of slot times.

⁵ *See* Exhibit AS-3.

Alaska's DCA-SAN service will enhance competition in the Washington, DC-San Diego market and immensely benefit both regions' business and tourism sectors. It will offer a valuable new option for the large volume of U.S. government (including military) travelers between Washington, DC, and San Diego, which is home to the nation's largest military community. What's more, Alaska will schedule its new DCA-SAN service to connect passengers traveling between Washington, DC, and other airports in the western U.S. and Hawai'i.⁶ And passengers can stop over in San Diego and enjoy all the region has to offer on their way to/from any of the 38 nonstop destinations Alaska serves from San Diego, 19 of which are served on a nonstop basis exclusively by Alaska.⁷ As discussed further below, Alaska's plans to bring nonstop DCA-SAN service offers substantial benefits to the nation's capital, San Diego and its large population of military personnel, and the SAN airport while enhancing competitive service options for nonstop and connecting passengers.

II. Alaska's Service Proposal Satisfies the FAA Reauthorization Act's Selection Criteria

Section 502 of the FAA Reauthorization Act of 2024 ("FAA 2024") directs the Department to consider "the extent to which the exemptions will (i) enhance options for nonstop travel to beyond-perimeter airports that do not have service from [DCA]...or (ii) have a positive impact on the overall level of competition in the markets that will be served as a result of those exemptions." Alaska's proposal satisfies both of these requirements.

First, Alaska's proposal will bring nonstop DCA service to SAN, a beyond-perimeter airport that does not (and as of the date of enactment of the FAA 2024, did not) have such

⁶ These airports include Fresno, CA (FAT), Las Vegas, NV (LAS), Monterey, CA (MRY), San Luis Obispo County, CA (SBP), San José, CA (SJC), Sacramento, CA (SMF), and Santa Rose, CA (STS) and, on a seasonal basis, Honolulu, HI (HNL), Kona, HI (KOA), and Lihue, HI (LIH).

⁷ See Exhibit AS-4.

Application of Alaska Airlines, Inc.

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service.⁸ SAN, with a “Passengers Per Day Each Way” (“PPDEW”) measure of 225, is by far the U.S. airport with the greatest number of passengers without nonstop service to DCA.⁹ For context, the second-largest domestic airport without nonstop service to DCA, San Antonio International Airport (“SAT”), has a PPDEW of 155.¹⁰ As a significant hub for the defense, biotech, and communications technology industries, San Diego requires efficient nonstop service options to the nation’s capital. In addition, DCA-SAN is one of the largest government-related travel markets and continues to grow in size. The General Services Administration (“GSA”) estimates that over 28,000 government personnel (civilian and military) will travel between DCA and SAN in Fiscal Year (“FY”) 2024, increasing to nearly 32,000 such personnel in FY 2025.¹¹ This demand reflects the location of key institutions in close proximity to DCA, like the Pentagon, the many federal agencies located in or close to downtown Washington, DC, and the numerous large military bases in the Washington, DC, area.

Currently, San Diego travelers must rely on connections to travel to DCA. Despite the current lack of nonstop service, in 2023, approximately 164,000 passengers traveled between SAN and DCA, accumulating an additional approximately 328,000 hours of annual travel time due to having to make a connection.¹² Alternatively, San Diego travelers may fly nonstop to

⁸ US Airways operated a daily nonstop flight between DCA and SAN from June 2012 (*see Docket DOT-OST-2012-0029, Notice of US Airways (Mar. 21, 2012)*) until the spring of 2014, when, following the American Airlines/US Airways merger, American switched the DCA-SAN service to DCA-LAX service. *See Docket DOT-OST-2012-0029, US Airways Change of Market for Beyond-Perimeter Slot Exemption (Jan. 15, 2014)*.

⁹ *See Exhibit AS-1.*

¹⁰ *See id.*

¹¹ *See Exhibit AS-5.* GSA also estimates approximately 42,000 additional government/military employees will travel between IAD and SAN in FY 2024 and FY 2025. *See id.*

¹² *See Exhibit AS-6.*

Application of Alaska Airlines, Inc.

Page 5

Washington Dulles International Airport (“IAD”), but that airport is located approximately 25 miles from downtown Washington, DC.

Washington, DC-San Diego is also a busy market for leisure and tourist travelers, with tourism generating \$23.4 billion for San Diego¹³ and \$10.2 billion¹⁴ for Washington, DC, in 2023. Alaska’s DCA-SAN service will meaningfully increase nonstop capacity and service options between Washington, DC, and San Diego, further benefitting consumers with fares that are on average lower than those of Alaska’s competitors. Following Alaska’s entry into the IAD-SAN market in Q2 2023, average fares on that route decreased by approximately 26%.¹⁵ Alaska expects this downward trend to continue with the introduction of its DCA-SAN service.

Second, Alaska’s new nonstop DCA-SAN service will have a positive effect on the overall level of fare and service competition not only on a nonstop basis between Washington, DC, and San Diego, but also for passengers who will benefit from a broader range of connecting service options between the Washington, DC, area and communities in the western U.S.¹⁶

¹³ See <https://sdtmd.org/case-study-san-diego-tourism-authority/#:~:text=Tourism%20is%20the%20third%20largest,related%20jobs%20in%20the%20County>.

¹⁴ See <https://washington.org/press/destination-dc-announces-record-visititation-economic-impact/#:~:text=Washington%20DC%20welcomed%2025.95%20million,a%20record%20102%2C366%20local%20jobs>.

¹⁵ See Exhibit AS-7.

¹⁶ Alaska’s DCA-SAN service will also further the goals of President Biden’s executive order addressing competition across the U.S. economy, which broadly directs the Department to take steps to “provide consumers with more flight options at better prices and with improved service, and to extend opportunities for competition and market entry as the industry evolves.” Executive Order on Promoting Competition in the American Economy (July 9, 2021), at § 5(m)(ii). See Exhibit AS-11.

III. Alaska Has a Strong Record of Developing Service at DCA and SAN Through Product Offerings That Provide Consumer Choice**A. Alaska's DCA Services**

Alaska began service at DCA in September 2001. Since then, Alaska has established popular and successful nonstop DCA flights to major West Coast cities beyond the DCA perimeter: today, Alaska operates nonstop service between DCA and Seattle, Portland, San Francisco, and Los Angeles, offering customers a variety of product offerings on each flight. San Diego will be an important addition to this list. Alaska has made exceptionally productive use of the limited number of slot exemptions it has been allocated to serve these West Coast beyond-perimeter cities. Alaska operates its DCA flights at an average 87.76% load factor and a 99.78% completion factor—both of which are the highest of all carriers operating at DCA.¹⁷ This performance exemplifies the efficiency with which Alaska operates its entire network. Systemwide, Alaska has an average completion factor of 99.28%, the second highest among the nation's largest carriers.¹⁸ Alaska also has the second highest on-time performance of all U.S. carriers, and the seventh highest on-time performance among all global carriers.¹⁹

B. San Diego is a Key Focus City for Alaska

Alaska began serving SAN in 1985 and has continued to grow at the airport ever since. Alaska currently employs approximately 800 San Diego-based team members, including a labor-represented flight attendant base, and serves 38 nonstop markets from San Diego, 19 of which are served exclusively by Alaska on a nonstop basis.²⁰ Those destinations include airports

¹⁷ See Exhibit AS-8.

¹⁸ See Exhibit AS-9.

¹⁹ See *id.*

²⁰ See Exhibit AS-4.

throughout the western U.S., as well as Los Cabos, Mexico, and Honolulu, Maui, Kona, and Lihue.

Since 2010, Alaska's departures at SAN have increased by 367%, its available seats at SAN have increased by 299%, and its available seat miles ("ASMs") at SAN have increased by 381%.²¹ To date this year, all of these figures exceed pre-pandemic levels, with departures up by 19%, seats up by 21%, and ASMs up by 38% compared with 2019. Alaska currently averages 59 daily departures from SAN, 6,400 daily departing seats, and 15.9 million daily ASMs.²² Alaska's ASMs at SAN have grown more than any other carrier since 2010.²³

Nonstop service to/from DCA will be an important addition to Alaska's existing network at SAN,²⁴ establishing a key additional transcontinental route that will enable Alaska to further grow at SAN and serve a broad range of passenger demand.²⁵

IV. Alaska Offers Consumers a Unique Combination of Low Fares and Award-Winning Service Across a Growing Network

Alaska is renowned for its unique and innovative business model, delivering low fares, award-winning service, and operational excellence for a broad range of passengers. Alaska's DCA-SAN service will provide a new, attractive service option for consumers and lower-fare competition against higher-fare legacy network carriers between Washington, DC, and San Diego. Customers traveling between SAN and DCA will have lounge access at both airports through Alaska's premium lounge program.

²¹ See Exhibit AS-10.

²² See *id.*

²³ See Exhibit AS-11.

²⁴ See Exhibit AS-12.

²⁵ See Exhibit AS-13.

Alaska successfully competes against larger carriers (including at their hubs and focus cities) by providing consumers a unique combination of lower fares across four product offerings, high-quality guest service, and an award-winning Mileage Plan loyalty program, which consistently ranks as the industry's highest-value loyalty program. Alaska's Mileage Plan Program has been ranked as the best airline rewards program for *nine consecutive years* by U.S. News & World Report²⁶ and *five consecutive years* by NerdWallet.²⁷ Alaska's Mileage Plan is at or near the top of the industry for many categories, including "reward rates," "best basic economy tickets," "operations," "elite status benefits," "total fees," and "in-flight experience."²⁸ Alaska's co-branded credit card²⁹ has a relatively modest annual fee of \$95, yet offers industry-leading benefits, including Alaska's "Famous Companion Fare,"³⁰ priority boarding, a free checked bag for the cardholder and up to six additional guests traveling on the same reservation, 20% off all Alaska inflight purchases and \$100 off an annual Alaska Lounge+ Membership.³¹ Moreover, at a time when many of the largest U.S. airlines have abandoned set redemption levels for award travel in favor of an opaque system that relies on dynamic pricing (often de-valuing how much a mile is worth), Alaska bases redemption on published award charts that clearly establish, by region, how many miles are needed for award travel, thus enabling members to

²⁶ See <https://www.usnews.com/info/blogs/press-room/articles/2023-07-25/u-s-news-announces-the-2023-2024-best-travel-rewards-programs> ("Alaska Airlines Mileage Plan holds on to the No. 1 spot for the ninth consecutive year in the Best Airline Rewards Programs ranking. The rewards program consistently outperforms others with its high earning power, and offers elite status members benefits like lounge access, upgrades and same-day confirmed flight changes.").

²⁷ See <https://www.nerdwallet.com/article/travel/alaska-airlines-mileage-plan-your-complete-guide> ("For the fifth year in a row, Alaska came in first in NerdWallet's airline rewards program analysis.").

²⁸ See *id.*

²⁹ See <https://www.alaskaair.com/content/credit-card/visa-signature>.

³⁰ Cardholders receive a \$99 companion fare (plus taxes and fees from \$23), valid on all Alaska flights booked on alaskaair.com, each account anniversary after spending \$6,000 or more on purchases within the prior anniversary year.

³¹ Alaska Lounge+ Members receive access to all Alaska lounges and nearly 90 partner airlines' lounges.

know when they join the Mileage Plan program and thereafter how many miles are needed for award travel.³²

Alaska also offers its guests a global network through its membership in the **oneworld** Alliance and partnerships with 30 airlines. With annual operating revenue of \$10.4 billion, 23,000 employees, and a fleet of 326 aircraft, Alaska has the resources to compete head-to-head with the larger carriers and a strong record of doing so.

A. *Alaska Continues to Invest in Growing Its Network to Enhance Competition Against the Much Larger “Big Four” Carriers*

Alaska has a history of network growth. During the pre-pandemic years of 2015-2019, Alaska (i) grew to become the largest West Coast carrier, including one of the top three carriers in six of the ten largest West Coast markets, and (ii) increased its number of destinations to 128.³³ Since 2010, Alaska grew faster than any of the Big Four carriers (American, Delta, United, and Southwest).³⁴ Alaska’s commitment to expansion at SAN is an important part of that growth. As a member of the **oneworld** Alliance, Alaska’s customers can book travel to more than 1,000 destinations on any of Alaska’s 30 worldwide airline partners while earning miles and redeeming award tickets.³⁵

B. *Alaska’s High-Quality Services Appeal to All Types of Air Travelers*

Alaska offers four distinct fare products³⁶ that appeal to the broadest range of travelers:

- Alaska’s First-Class product features the most legroom in any U.S. domestic airline, priority boarding, a dedicated flight attendant for the First-Class cabin,

³² See <https://www.alaskaair.com/content/mileage-plan/use-miles/award-charts>.

³³ In April, Alaska announced new nonstop service between San Diego and Las Vegas, beginning October 1, 2024. See <https://news.alaskaair.com/alaska-airlines/alaska-airlines-expands-presence-in-southern-california-with-new-routes-and-increased-service-to-popular-west-coast-destinations/>.

³⁴ See Exhibit AS-14.

³⁵ See Exhibit AS-15.

³⁶ See Exhibit AS-16.

two complimentary checked bags, lounge access on select flights, and complimentary food and drinks.

- Alaska's Premium Class product features include extra legroom, early boarding, and complimentary beer, wine and cocktails.
- Alaska's award-winning Main Cabin offers passengers an unrivaled inflight service, no change fees, and complimentary seat selection.
- Alaska's Saver Fare, popular among price-sensitive travelers, features Alaska's lowest rates and offers a complimentary carry-on bag and Alaska's Main Cabin inflight amenities.

Alaska offers high-speed internet access for purchase across all cabins. Alaska aircraft are equipped with a streaming entertainment system, enabling passengers to choose from a library of over 800 free movies and television shows to watch on their own device. Alaska offers hot and cold meal options for purchase by Premium, Main Cabin, and Saver Fare passengers.

C. *Alaska's Award-Winning Service*

Alaska's ability to deliver high-quality service reliably and consistently over time is unmatched by the competition. It has earned countless awards, including: 2024 Best U.S. Airline & Frequent Flier Program (Wallet Hub); Top Airline Reputation (2024 Axios Harris Poll); 2023 Worldwide Airline of the Year (Centre for Aviation); Best Airline Overall and #1 for Crew, Comfort, Food, and Boarding (KAYAK 2023); Best Airline Rewards (US News 2023-2024); Best Employers for Diversity (Forbes 2024); Best Airline Rewards (NerdWallet 2023); Best Customer Service (Newsweek 2023); and Best Airline in North America (APEX 2022).³⁷

D. *Alaska's Environmental Commitment*

Alaska's growth has been guided by its core values, including a commitment to environmental stewardship. Alaska has set a long-term goal to achieve net-zero carbon emissions

³⁷ See Exhibit AS-17.

by 2040,³⁸ which exceeds the International Civil Aviation Organization's long-term net-zero target of 2050.³⁹ Since announcing this goal, Alaska has made historic orders for new, more efficient aircraft, built a coalition of sustainable aviation fuel partners, and advanced the use of artificial intelligence to fly more efficient routings that reduce fuel consumption.

Alaska is proud to be the first U.S. airline to eliminate plastic bottles, cups, straws, stir packs, and citrus picks. By partnering with Boxed Water and serving drinks in responsibly sourced paper cups, Alaska saves over 2.2 million pounds of plastic from landfills every year. Alaska also encourages guests to #FillBeforeYouFly, avoiding waste altogether by bringing refillable water bottles and filling them up at the airport before a flight.

V. Governmental, Business and Civic Leaders Strongly Support Alaska's DCA-SAN Service Proposal

Alaska's proposal to introduce daily nonstop service between DCA and San Diego has garnered strong support from a wide range of San Diego area and State of California government leaders, as well as the San Diego area business and civic communities. Exhibit AS-19 lists and provides copies of letters of support from those diverse interests for Alaska's proposal. These parties recognize the substantial public benefits that Alaska's service will generate for the San Diego area and other western U.S. communities, as well as for passengers, including business, government, military, and leisure travelers.

³⁸ See Exhibit AS-18.

³⁹ See <https://www.icao.int/Newsroom/Pages/States-adopts-netzero-2050-aspirational-goal-for-international-flight-operations.aspx>.

Application of Alaska Airlines, Inc.

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VI. Conclusion

For all of the foregoing reasons, Alaska Airlines, Inc. requests that the Department grant it two slot exemptions at Ronald Reagan Washington National Airport to enable Alaska to operate once-daily nonstop roundtrip service to/from San Diego International Airport.

Respectfully submitted,



David Hefferan
Michael Deutsch
COZEN O'CONNOR
1200 19th Street, NW
Washington, DC 20036
dheffernan@cozen.com
mdeutsch@cozen.com

Counsel for
ALASKA AIRLINES, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing Application of Alaska Airlines, Inc. by electronic mail upon the following:

ABX Air/Air Transport Int'l:	bleopard@sgbdc.com mgoldman@sgbdc.com
Air Canada:	anita.mosner@hklaw.com
Allegiant Air:	agoerlich@ggh-airlaw.com
American Airlines:	molly.wilkinson@aa.com brent.alex@aa.com
Amerijet Int'l:	rleon@amerijet.com
Atlas Air:	sascha.vanderbellen@atlasair.com keinan.meginniss@atlasair.com
Centurion/Skylease:	john@mietuslaw.com
Delta Air Lines:	chris.walker@delta.com steven.seiden@delta.com
Federal Express:	anne.bechdolt@fedex.com brian.hedberg@fedex.com sllunsford@fedex.com
Frontier Airlines:	howard.diamond@flyfrontier.com
Hawaiian Airlines:	perkmann@cooley.com
JetBlue Airways:	robert.land@jetblue.com reese.davidson@jetblue.com
Kalitta Air:	jfoglia@cozen.com rschwartz@cozen.com hnicholl@kalittaair.com nwallace@wallaceair.com mbenge@kmazuckert.com acampbell@northernaviationservices.aero
National Airlines:	kevin.montgomery@polaraircargo.com
Northern Air Cargo:	leslie.abbott@wnco.com
Polar Air Cargo:	jyoung@yklaw.com
Southwest Airlines:	dkirstein@yklaw.com
Spirit Airlines:	rose.neale@suncountry.com eric.levenhagen@suncountry.com
Sun Country Airlines:	aarshad@crowell.com steve.morrissey@united.com dan.weiss@united.com
United Airlines:	anita.mosner@hklaw.com lawrence.fields@faa.gov
UPS:	
FAA:	



Michael Deutsch

DATED: July 8, 2024

EXHIBITS

Exhibit AS-1 San Diego is By Far the Largest U.S. Airport Without Nonstop Service to DCA

Exhibit AS-2 Alaska's DCA-SAN Proposed Schedule

Exhibit AS-3 Alaska Will Operate DCA-SAN Service Using Boeing 737-800 or 737-8 MAX Aircraft

Exhibit AS-4 Alaska Serves 38 Airports Nonstop From San Diego

Exhibit AS-5 Alaska's DCA-SAN Nonstop Service Will Provide Substantial Benefits for U.S. Government and Military Travelers

Exhibit AS-6 Current DCA-SAN Passengers Experience 2hr+ Connections

Exhibit AS-7 Current IAD-SAN Nonstop Services

Exhibit AS-8 Alaska Has a Successful Track Record of Serving West Coast Cities From DCA

Exhibit AS-9 Alaska's Systemwide Operational Performance is Excellent

Exhibit AS-10 Alaska Has Achieved Consistent Growth at SAN

Exhibit AS-11 Alaska Has Grown at SAN More than Any Other Carrier Since 2010

Exhibit AS-12 Alaska's SAN Route Map

Exhibit AS-13 Alaska is Committed to Growing its Transcontinental Services at SAN

Exhibit AS-14 Since 2010 Alaska's Domestic Service Network Grew Far Faster Than American, Delta, United, and Southwest

Exhibit AS-15 Alaska's Membership in the **oneworld** Alliance Allows it to Connect Passengers to Destinations Throughout the World

Exhibit AS-16 Alaska Offers Four Distinct Categories of Fare Products, Which Demonstrates Alaska's Appeal to All Types of Travelers

Exhibit AS-17 Alaska Is Recognized as an Industry Leader Among U.S. Airlines

Exhibit AS-18 Alaska Prioritizes Sustainability, With a Commitment to Net Zero Emissions by 2040

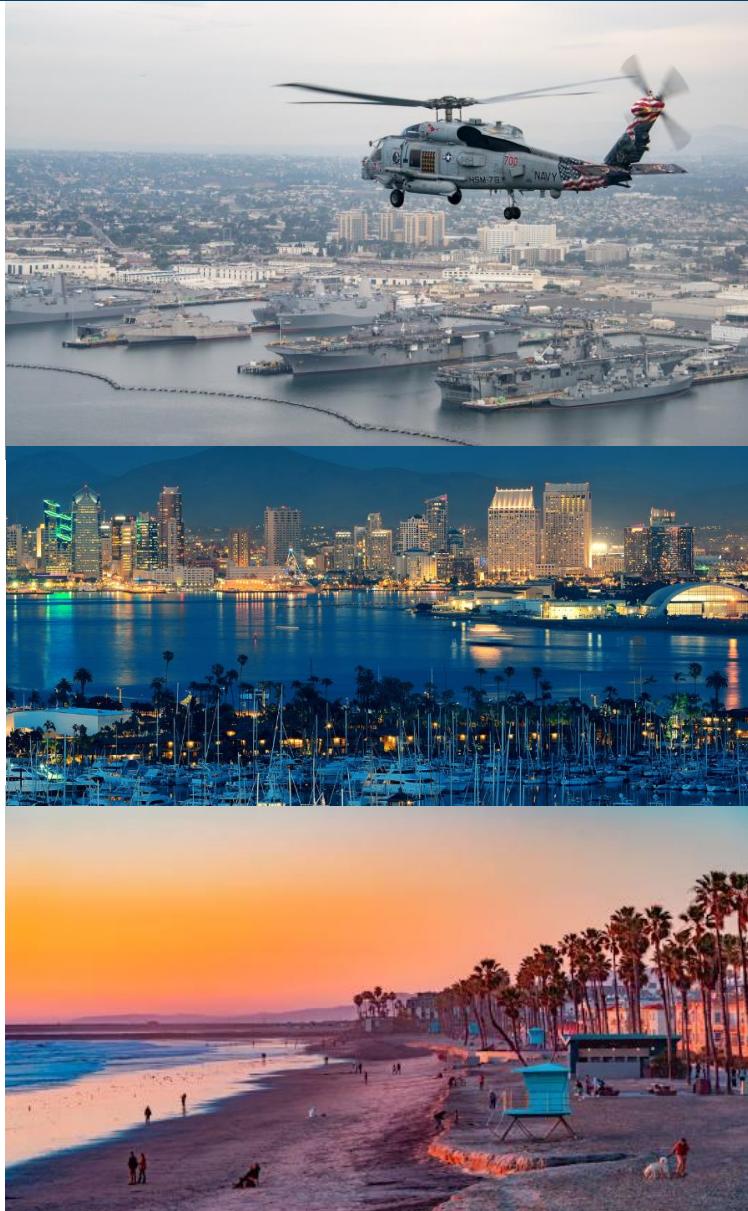
Exhibit AS-19

Letters of Support for Alaska's DCA-SAN Nonstop Service Proposal



San Diego is By Far the Largest U.S. Airport Without Nonstop Service to DCA

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Top 10 Unserved DCA Markets by Passengers Per Day Each Way (PPDEW)

Destination	PPDEW	
<u>#1 unserved</u>	SAN	225
SAT	155	
ABQ	123	
SMF	106	
SNA	82	
ONT	77	
HNL	76	
TUS	76	
ELP	69	

Source: Cirium: Passengers Per Day Each Way, YE Q4 2023



Alaska's DCA-SAN Proposed Schedule

Route	Flight #	Frequency	Equipment	Departure*	Arrival*	Elapsed Time
SAN-DCA	14	Daily	737-800 or 737-8M	8:30 a.m.	4:30 p.m.	5:00
DCA-SAN	15	Daily	737-800 or 737-8M	5:30 p.m.	7:50 p.m.	5:20

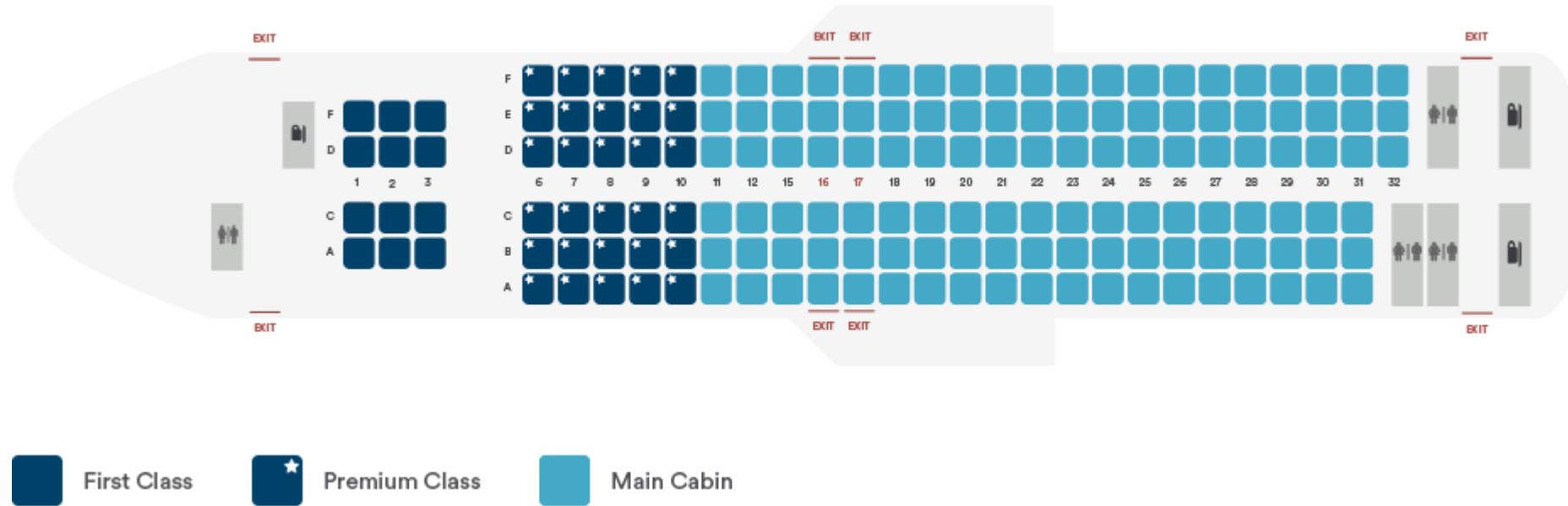
*All times local

Exhibit AS-2



Alaska Will Operate its DCA-SAN Service Using its Boeing 737-800 or Boeing 737-8 MAX Aircraft

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737-800 & 737-8 MAX

Total Seats: 159

First: 12

Premium:30

Coach:117



Alaska Serves 38 Airports Nonstop From San Diego

ATL	HNL	OGG	SJD	FCA*
AUS	IAD	PAE	SLC	FLL*
BOI	JFK	PDX	SMF	HDN*
BOS	KOA	RDM	STS	JAC*
EUG	LAS	SBP	TPA	MSO*
EWR	LIH	SEA	ANC*	PVR*
FAT	MCO	SFO	BZN*	
GEG	MRY	SJC	CUN*	

*Seasonal service

The following airports are served only by Alaska from SAN on a nonstop basis: ANC, BZN, CUN, EUG, FAT, FCA, GEG, HDN, JAC, KOA, LIH, MCO, MRY, MSO, PAE, PVR, RDM, SBP, and STS



Alaska's DCA-SAN Nonstop Service Will Provide Substantial Benefits for U.S. Government and Military Travelers

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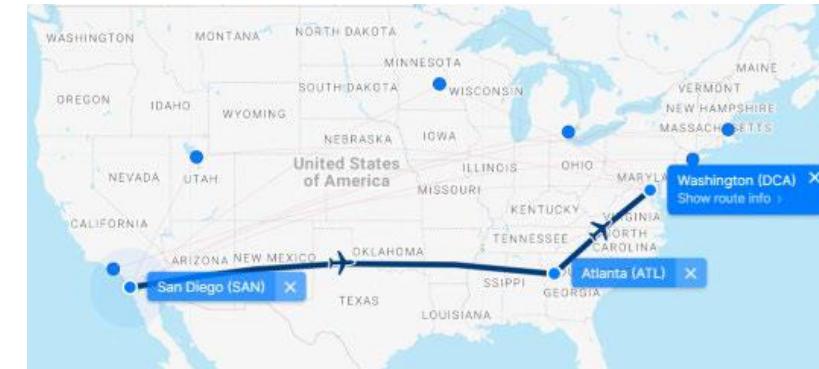
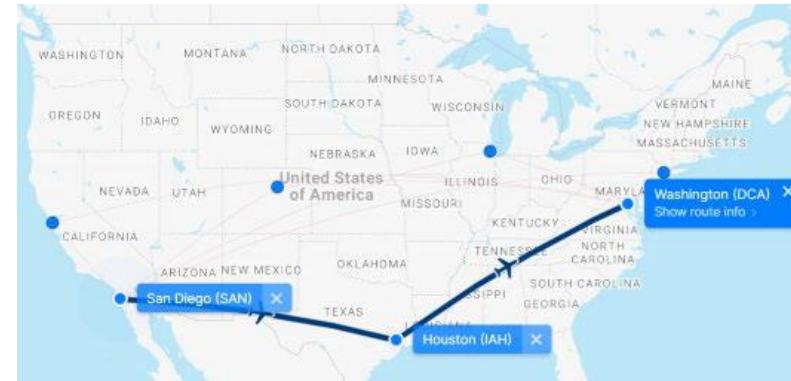
	Projected FY 2024	Projected FY 2025
DCA-SAN	28,317 passengers	31,692 passengers
IAD-SAN	14,979 passengers	27,734 passengers

Source: GSA Solicitations



Current DCA-SAN Passengers Experience 2hr+ Connections

In 2023, 164,000 passengers traveled between SAN and DCA, accumulating approximately 328,000 hours in connecting time.



Connecting To/From DCA	Duration
DL	7 hours
AA	7.5 hours
UA	7.5 hours

Nonstop to/from IAD	Duration
SAN-IAD	5 hours
IAD-SAN	5.2 hours

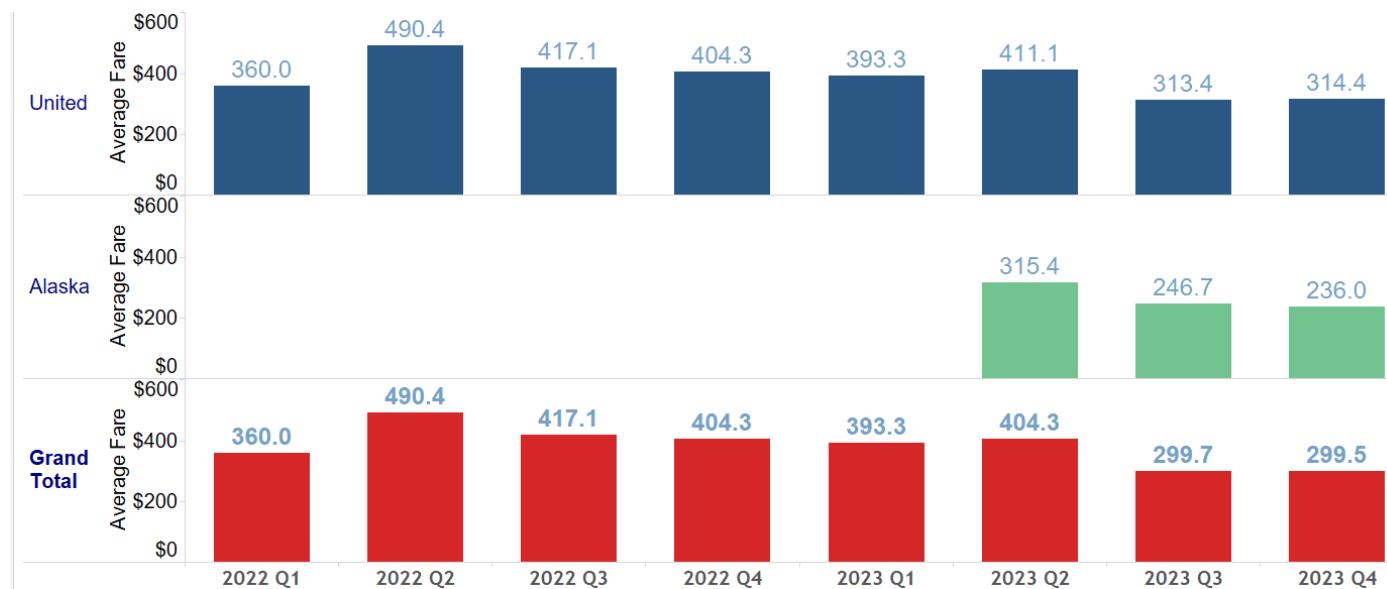


Sources: U.S. DOT O&D Dynamic Table Report for flights from DCA to SAN for travel YE Q4 2023; Cirium Mi O&D connection points are based off largest pax share from SAN-DCA by airline; Duration is an average of schedule.



Current IAD-SAN Nonstop Services

- United Airlines operates three (3) daily round-trip nonstop flights between IAD and SAN and Alaska operates one (1) daily round-trip nonstop flight between IAD and SAN.
- After Alaska entered the route in Q2 2023, average fares on the route decreased by nearly 26%, from Q4 2022 (\$404.30) to Q4 2023 (\$299.50).



Sources: Metropolitan Washington Airports Authority March 2024 Air Traffic Statistics; U.S. DOT DB1B Database. Average nonstop one-way O&D fares including fees and taxes between IAD and SAN.



Alaska Has a Successful Track Record of Serving West Coast Cities From DCA

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- Alaska began operations at DCA in September 2001.
- Alaska has the highest completion rate and load factor to/from DCA

DCA Completion Rate

Date	Op Carrier	Comp Rate	Comp Rank
2023	AS	99.78%	1
2023	WN	99.30%	2
2023	DL	98.93%	3
2023	UA	98.70%	4
2023	AA	98.70%	5
2023	F9	98.30%	6
2023	B6	98.25%	7

Source: Cirium 2023

DCA Load Factor

Date	Op Carrier	Load Factor	Comp Rank
Feb. 2024	AS	87.76%	1
Feb. 2024	DL	84.43%	2
Feb. 2024	UA	83.77%	3
Feb. 2024	F9	83.56%	4
Feb. 2024	AA	82.14%	5
Feb. 2024	B6	82.00%	6
Feb. 2024	WN	77.44%	7

Source: US DOT T-100, YE Feb 2024



Alaska's Systemwide Operational Performance is Excellent

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Systemwide Completion Rate Among U.S. Carriers

Date	Carrier	Comp Rate	Rank
2023	Southwest	99.38%	1
2023	Alaska	99.28%	2
2023	American	99.09%	3
2023	Spirit	99.04%	4
2023	Delta	99.02%	5
2023	United	98.59%	6
2023	Frontier	98.35%	7

Source: Cirium 2023

Systemwide On-Time Performance Among U.S. Carriers

Date	Carrier	On-Time Performance	Rank
2023	Delta	83.21%	1
2023	Alaska	81.04%	2
2023	American	79.11%	3
2023	United	78.67%	4
2023	Southwest	75.51%	5
2023	Spirit	69.45%	6
2023	JetBlue	68.52%	7

Source: OAG Schedules Analyser 2023. 80% coverage limit applied



Alaska Has Achieved Consistent Growth at SAN



- 2023 vs. 2010 SAN growth
 - Departures: +367%
 - Seats: +299%
 - ASMs: +381%



- Avg 51 daily departures in 2023
 - *Increases to 59 daily in 2024*



- 6.4 thousand daily departing seats in 2023



- 15.9 million daily ASMs in 2023

SAN Capacity growth

Year	Departures	Seats	ASMs
2011	16%	17%	30%
2012	29%	20%	27%
2013	28%	26%	32%
2014	9%	10%	9%
2015	4%	5%	5%
2016	10%	8%	6%
2017	25%	19%	20%
2018	38%	29%	22%
2019	11%	11%	5%
2020	(39%)	(45%)	(49%)
2021	54%	57%	75%
2022	11%	16%	22%
2023	(2%)*	4%	9%

*In 2023, Alaska deployed larger-capacity aircraft at SAN, which resulted in a slight reduction in the number of departures while enabling Alaska to continue to increase its aircraft seats and ASMs at SAN.



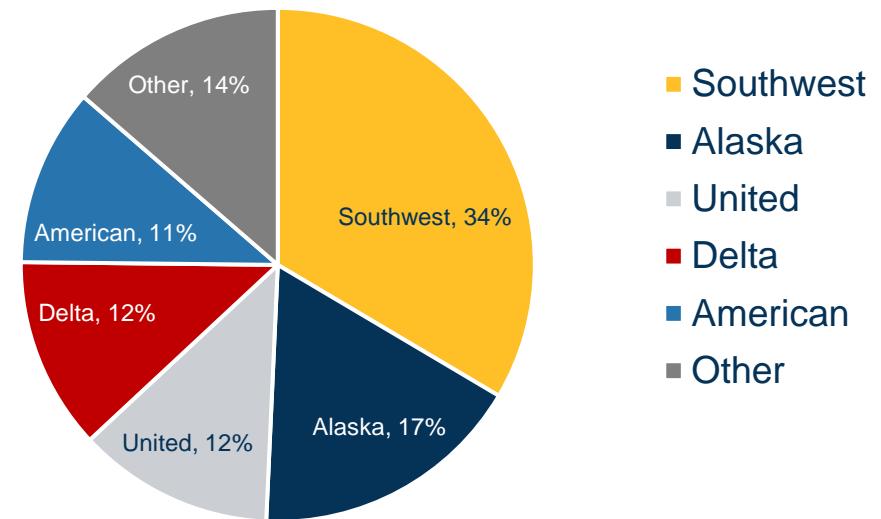
Alaska Has Grown at SAN More than Any Carrier Since 2010

SAN Capacity growth 2023 vs 2010

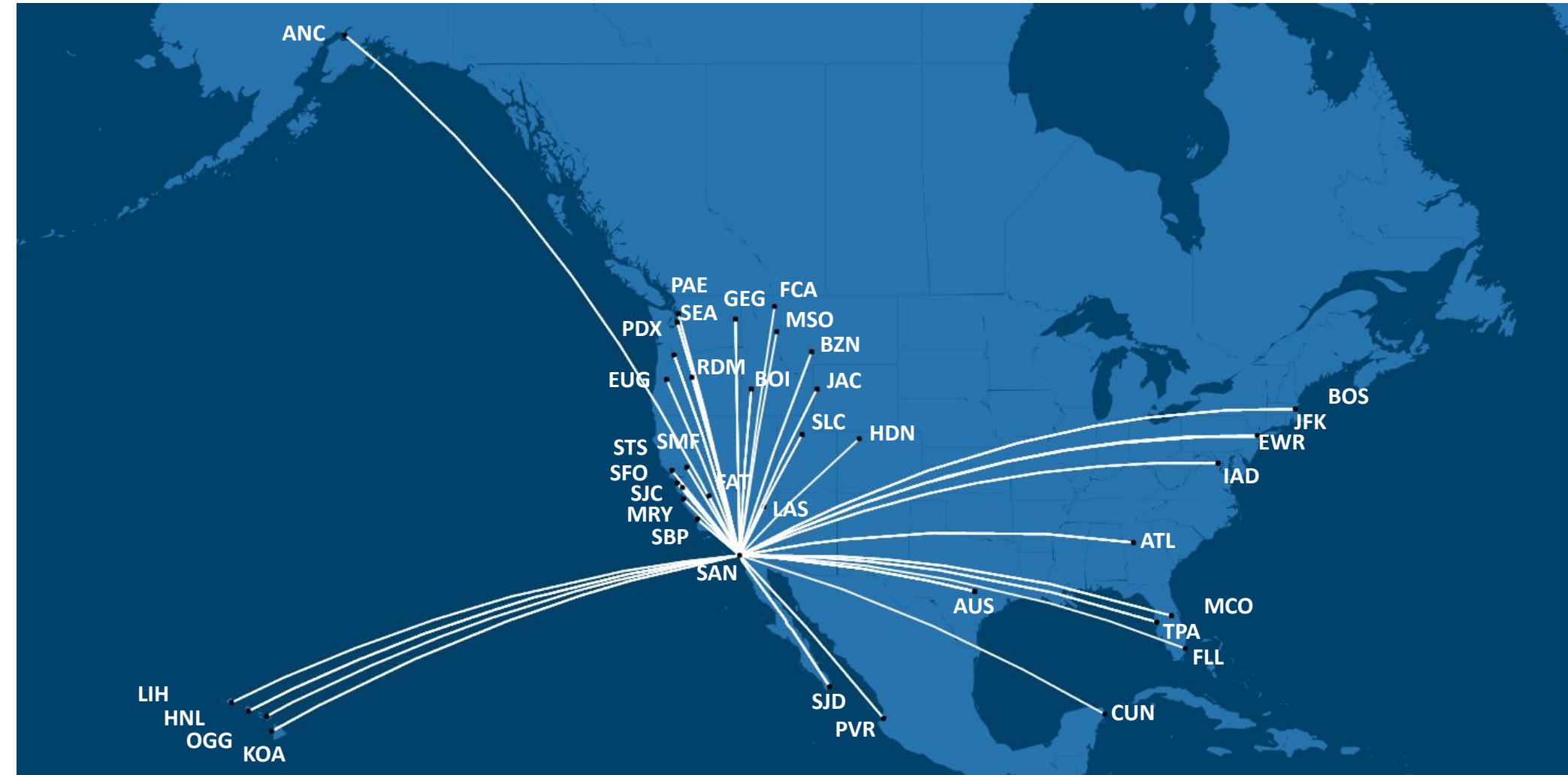
Carrier	ASMs
AS	381%
F9	109%
AA	105%
UA	92%
B6	72%
DL	54%
WN	44%

Source: Cirium YE Dec 2010 vs YE Dec 2023

SAN Seats

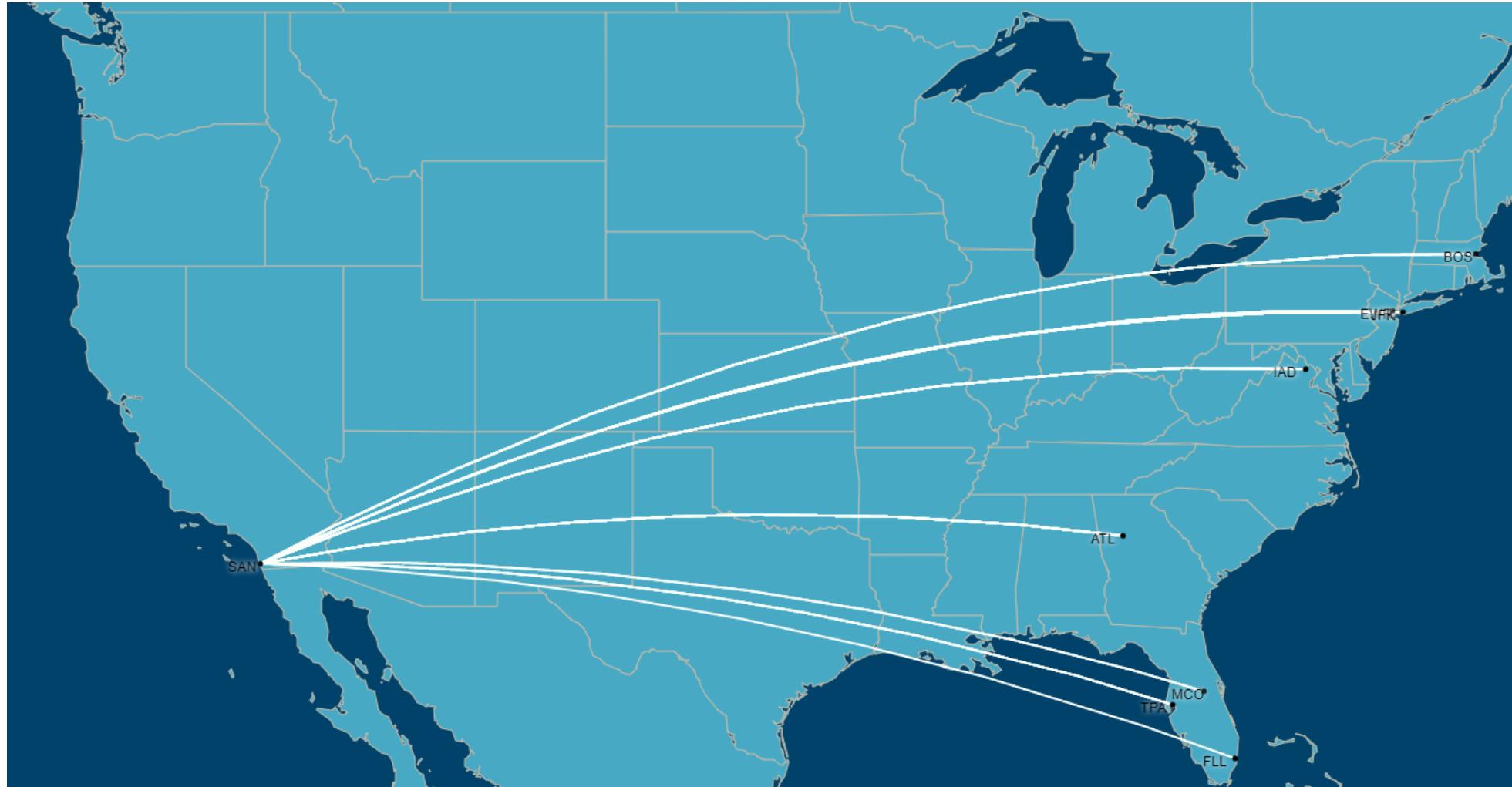


Source: Cirium YE Dec 2024, SAN to North America seats





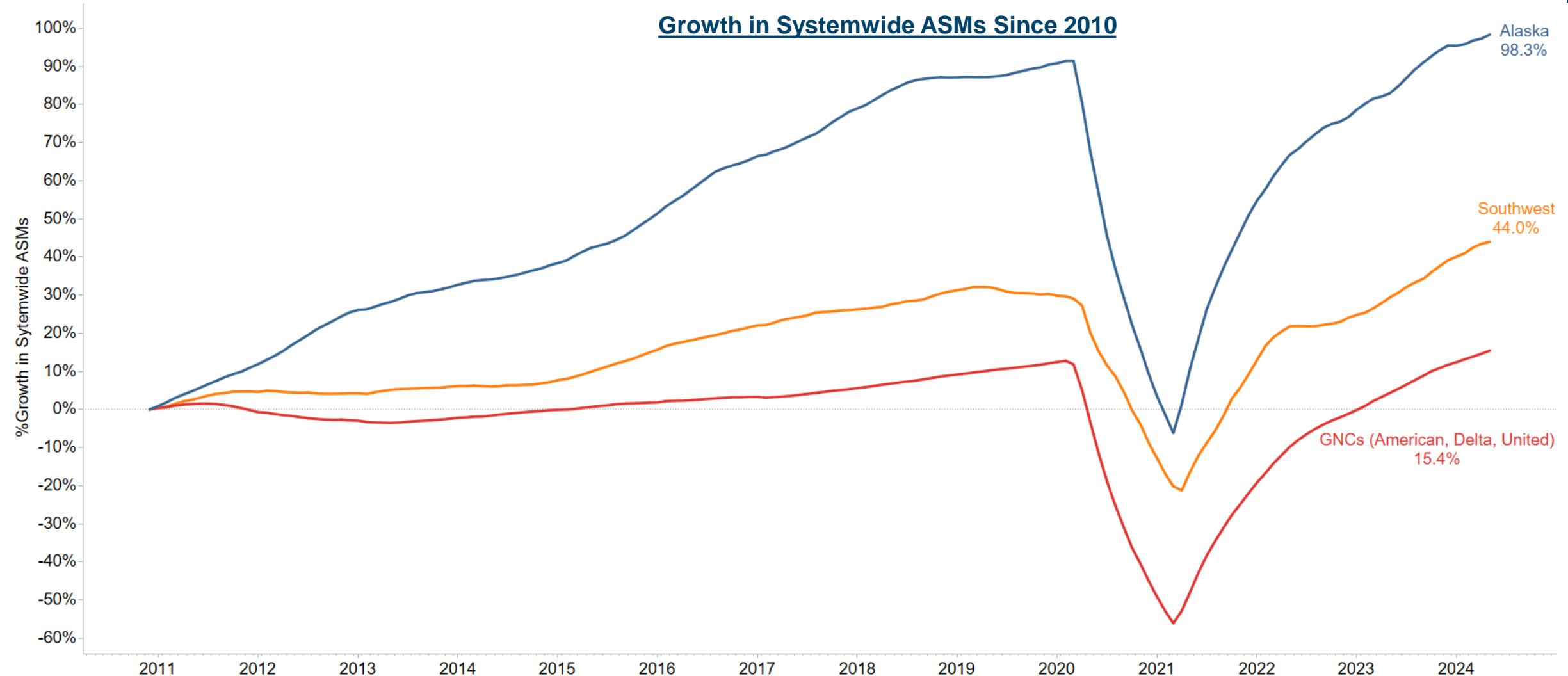
Alaska is Committed to Growing its Transcontinental Services at SAN





Since 2010 Alaska's Domestic Service Network Grew Far Faster Than American, Delta, United, and Southwest

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Alaska's Membership in the oneworld Alliance Allows it to Connect Passengers to Destinations Throughout the World





Alaska Offers Four Distinct Categories of Fare Products, Which Demonstrates Alaska's Appeal to All Types of Travelers

- **First Class** – The most legroom of any U.S. domestic airline, priority boarding, two complimentary checked bags, a dedicated First Class flight attendant, lounge access on select flights, and complimentary food and drinks.
- **Premium Class** – Four extra inches of legroom, early boarding, and complimentary beer/wine/cocktails.
- **Main Cabin** – Complimentary advance seat selection, no change fees, and unrivaled inflight service
- **Saver** – Unlike ULCCs, Alaska's Saver fare permits a carry-on bag at no extra cost.

Travel benefits	Saver fare Budget-friendly essentials	Main Cabin Award-winning classic	Premium Class The elevated standard	First Class Alaska's luxury experience
★ Earn Mileage Plan miles	Limited	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
กระเป๋า Carry on included		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
💺 Seat selection		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
🕒 Board and deplane early				<input checked="" type="checkbox"/>
💺 Extra legroom			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
🍸 Free beer, wine, and cocktails			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
🍴 Complimentary food and drinks				<input checked="" type="checkbox"/>
👤 Dedicated flight attendant				<input checked="" type="checkbox"/>
💺 Access to Alaska Lounge*				<input checked="" type="checkbox"/>
กระเป๋า Two free checked bags				<input checked="" type="checkbox"/>

Alaska Is Recognized as an Industry Leader Among U.S. Airlines



Best U.S. Airline &
Best Frequent Flier Program
Wallet Hub 2024



Top Airline Reputation
Axios Harris Poll 2024



Best Customer Service
Forbes 2024



Customer Experience All-
Stars
Forbes 2024



Fortune 500® list
Fortune 2024



Most Family Friendly
Airline
Good Housekeeping 2024



Best U.S. Airlines
The Points Guy 2024



Best Airline
Newsweek 2024



Best Employers for Diversity
Forbes 2024



Best Employers for Women
Forbes 2023



Corporate Equality Index
Human Rights Campaign
Foundation 2024



World's Safest Airlines
#1 U.S. airline, Top 10 in world
Airline Ratings 2018-2024



Best Airline
Rewards
US News 2023-2024



Best Airline
Rewards
NerdWallet 2023



Best Large Employers
Forbes 2023



NORTH AMERICA'S BEST AIRLINES

Best Airline Overall
And #1 for Crew, Comfort,
Food, and Boarding
KAYAK 2023
- SA41 -



100%
SCORE

Best Places to Work
Disability Equality Index 2023



Most Influential
Companies
TIME100 2022



2022 Worldwide
Airline of the Year
Air Transport World

Exhibit AS-17



Alaska Prioritizes Sustainability, With a Commitment to Net Zero Emissions by 2040

5

Carbon Offsets and Removals

Credible, high-quality carbon removal solutions that meet our criteria, only as needed to close the gap to target

4

New Technologies

Including electrified, hydrogen and hybrid-electric aircraft, and other innovations

3

Sustainable Aviation Fuel (SAF)

Safe, drop-in, alternative jet fuel with significantly lower lifecycle carbon footprint, made from recycled carbon sources

2

Fleet Renewal

Bringing new, more fuel-efficient aircraft into our fleet

1

Operational Efficiency

Continued fuel saving and route optimizing initiatives—Flyways, Required Navigation Performance, single-engine taxi procedures, and more



Exhibit AS-19**Letters of Support for Alaska's DCA-SAN Nonstop Service Proposal****Elected Officials:**

1. Members of Congress Representing San Diego – Rep. Sara Jacobs, Rep. Juan Vargas, Rep. Scott H Peters, Rep. Mike Levin, Rep. Darrell Issa
2. San Diego Mayor Todd Gloria
3. California State Senator Toni Atkins (39th Senate District and Senate President pro Tempore Emeritas)
4. California State Senator Stephen Padilla (18th Senate District)
5. California State Senator Catherine Blakespear (38th Senate District)
6. California State Senator Brian Jones (40th Senate District)
7. Assemblymember Chris Ward (78th Assembly District)
8. Assemblymember David Alvarez (80th Assembly District)
9. Assemblymember Akilah Weber (79th Assembly District)
10. Assemblymember Brian Maienschein (76th Assembly District)
11. Chairwoman, Nora Vargas, San Diego Board of Supervisors
12. Supervisor Joel Anderson, San Diego Board of Supervisors
13. Vice Chair Terra Lawson-Remer, San Diego Board of Supervisors
14. Supervisor Monica Montgomery Steppe, San Diego Board of Supervisors
15. Supervisor Jim Desmond, San Diego Board of Supervisors
16. Council President Sean Elo-Rivera, San Diego City Council (District 9)
17. Council President Pro Tem Joe LaCava, San Diego City Council (District 1)
18. Councilmember Stephen Whitburn, San Diego City Council (District 3)
19. Councilmember Henry Foster III, San Diego City Council (District 4)
20. Councilmember Marni von Wilpert, San Diego City Council (District 5)
21. Councilmember Kent Lee, San Diego City Council (District 6)
22. Councilmember Raul Campillo, San Diego City Council (District 7)
23. Councilmember Vivian Moreno, San Diego City Council (District 8)
24. Oceanside Mayor Esther Sanchez
25. Poway Mayor Steve Vaus
26. Imperial Beach Mayor Paloma Aguirre
27. Chula Vista Mayor John McCann
28. Vista Mayor John Franklin
29. Solana Beach Mayor Lesa Heebner
30. Escondido Mayor Dane White
31. San Marcos Mayor Rebecca Jones

Labor:

1. Alaska Airlines Master Executive Council – Air Line Pilots Association, International
2. Aircraft Mechanics Fraternal Association
3. San Diego and Imperial Counties Labor Council, AFL-CIO

Airport & Port

1. San Diego International Airport

2. Port of San Diego

Associations

1. San Diego Tourism Authority
2. California Travel Association
3. San Diego Regional Chamber of Commerce
4. East County Chamber of Commerce
5. North San Diego Business Chamber
6. San Diego County Lodging Association
7. San Diego Regional Economic Development Council
8. San Diego East County Economic Development Council
9. South County Economic Development Council
10. Imperial Valley Economic Development Corporation
11. Downtown San Diego Partnership
12. San Diego Sport Innovators/Sports San Diego
13. San Diego Working Waterfront
14. San Diego Convention Center Corporation
15. Asian Business Association of San Diego
16. CA State Hispanic Chamber of Commerce
17. CA State African American Chamber of Commerce
18. Cyber Center of Excellence
19. NAIOP Commercial Real Estate Development Association
20. Cleantech
21. San Deigo Sport Innovators

Businesses:

1. SeaWorld San Diego
2. Lockheed Martin Corporation
3. General Atomics
4. Qualcomm
5. Deloitte
6. Boston Consulting Group – San Diego
7. Clark Construction
8. Cox
9. Cultura
10. TaylorMade Golf Company
11. Evans Hotels
12. Firestorm
13. Aquacycl
14. GKN Aerospace
15. Biocom
16. Health Innovation Products
17. Intesa Communications Group

18. Quantum Applied Science and Research (QUASAR) and Wearable Sensing
19. Epitope Diagnostics, Inc.
20. Visaic, Inc.
21. Ace Parking
22. Illumina
23. Harland Brewing Company
24. Scout Distribution
25. REP Publishing, Inc.

Government & Education:

1. San Deigo Association of Governments
2. San Diego County Water Authority
3. San Diego Gas & Electric
4. San Diego State University
 1. University of California SD Chancellor Pradeep K. Khosla
 2. UCSD Jacobs School of Engineering
 3. MiraCosta College
 4. California State University, San Marcos
 5. Point Loma Nazarene University

Military/Veterans Organizations:

1. San Diego Military Advisory Council (SDMAC)
2. Veterans In Business Network
3. Coalition of retired military leaders

Nonprofits:

1. San Diego Zoo Wildlife Alliance
2. Burnham Center
3. The Leukemia and & Lymphoma Society, Southern California/Hawaii Region
4. United Way of San Diego County
5. Policy & Innovation Center

Congress of the United States

Washington, DC 20515

May 16, 2024

The Honorable Pete Buttigieg
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Dear Secretary Buttigieg,

We write to you regarding the recently passed Federal Aviation Administration Reauthorization Act, as Members of Congress representing San Diego, California. We are thrilled that this reauthorization included additional slots at Washington, D.C.'s Ronald Reagan National Airport (DCA), and we are respectfully requesting that the Department of Transportation, under your leadership, ensure that at least one of the newly approved slot pairs allows for a non-stop flight to and from San Diego, CA.

As the eighth largest city in the United States, San Diego is the largest passenger market located outside the perimeter without non-stop service to DCA. Terminal 1 of the San Diego International Airport is currently undergoing upgrades and renovations to add 30 new gates to meet the existing and growing demand of travelers. In 2023 alone, visitors spent roughly \$14.3 billion in San Diego and the city welcomed 31.8 million visitors.

San Diego is also home to 110,000 active-duty military personnel and more than 118,000 of their family members, making it the largest military community in the United States. Our nation's service members should have an efficient route from one of San Diego's four installations to the Pentagon, but expensive plane tickets and additional time on flights hinder their job performance. A direct flight would dramatically improve their commute to Washington, D.C. and their ability to focus on their mission. Given San Diego's military presence and its status as a binational tourist destination, a direct non-stop flight to and from DCA would improve our community's ability to thrive, grow, and meet the national security demands of our country.

We appreciate your work to implement this FAA Reauthorization, and we appreciate your urgent consideration of this important request.

Sincerely,



Sara Jacobs

Member of Congress



Scott H. Peters

Member of Congress



Darrell Issa

Member of Congress



Juan Vargas

Member of Congress



Mike Levin

Member of Congress



THE CITY OF SAN DIEGO

TODD GLORIA

MAYOR

June 3, 2024

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

RE: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

As Mayor of the City of San Diego, I am writing to express my strong support for Alaska Airlines' application to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). As the largest market in the country not serviced by DCA, this new route is vital for enhancing the connectivity between these two strategic regions, but also will support the growing demand for nonstop service for both business and leisure passengers.

As you know, San Diego and Washington, D.C. are hubs of significant defense, economic, and tourism industries. San Diego's core sectors in defense, biotech and communications technology require efficient access to key institutions closest to DCA including the Pentagon, Department of Homeland Security, and the U.S. Congress.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, but the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000-passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

I am confident that Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it an ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and, in the last 10 years, has grown by more than 75%. Today, that means about 6,500 passengers served daily and 60 average daily departures from SAN.

Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and provide a more streamlined, efficient service that will benefit the greatest number of passengers.

Thank you for your consideration of this application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Todd Gloria".

TODD GLORIA

Mayor

City of San Diego

CAPITOL OFFICE
1021 O ST, SUITE 8610
SACRAMENTO, CA 95814
TEL (916) 651-4030
FAX (916) 651-4939

DISTRICT OFFICE
7575 METROPOLITAN DR SUITE 100
SAN DIEGO, CA 92108
TEL (619) 688-6700
FAX (619) 688-6712

SENATOR ATKINS SENATE.GOV



SENATOR TONI G. ATKINS
PRESIDENT PRO TEMPORE EMERITUS

Page 89 of 271

Filed: 01/27/2025

Document #2096840

USCA Case #25-1002

June 21, 2024

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington DC 20590

Subject: Alaska Airlines' Application for SAN-DCA

Dear Secretary Buttigieg:

I write in strong support of the application submitted by Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). As significant defense, economic, and social activity hubs, San Diego and Washington, D.C. will stand to mutually benefit from enhancing connectivity between the two regions.

San Diego's economic engines of defense, biotech, and communications technology require efficient access to the core of the national capital region, but there is a critical gap in the air service network between SAN and DCA at this moment. Although San Diego is the second biggest government related travel market in the United States, it is presently the largest domestic market not serviced by DCA. With over 225 passengers that fly each direction daily, San Diego is the largest origin-destination market without service to Reagan National.

Alaska Airlines' positive reputation for service, reliability, and customer satisfaction make it an exceptional carrier to bridge the markets of San Diego and Washington, D.C. Alaska Airlines began serving SAN in 1985 and has grown by more than 75 percent in the last 10 years. This now means that Alaska Airlines is responsible for serving 6,500 guests and 60 departures from SAN on average each day.

Adding nonstop service from DCA to Alaska Airlines' daily destinations from SAN not only bridges two strategic regions, but also supports sectors of national and regional



importance. A nonstop route will help benefit the greatest number of travelers by fulfilling growing demand from business and leisure passengers, increasing connectivity, and offering a more efficient service.

Thank you for your favorable consideration of this application.

Warmly,



TONI G. ATKINS
Senate President pro Tempore Emeritus
39th Senate District

TGA:cr

CAPITOL OFFICE
1021 O STREET SUITE 6640
SACRAMENTO, CA 95814
TEL (916) 651-4018
FAX (916) 651-4918

SAN DIEGO COUNTY DISTRICT OFFICE
780 BAY BOULEVARD, SUITE 204
CHULA VISTA, CA 91910
TEL (619) 409-7690

IMPERIAL COUNTY DISTRICT OFFICE
1224 STATE STREET, SUITE D
EL CENTRO, CA 92243
TEL (760) 335-3442

RIVERSIDE COUNTY DISTRICT OFFICE
82013 DR. CARREON BOULEVARD, SUITE L
INDIO, CA 92201
TEL (760) 398-6442

WWW.SENATE.CA.GOV/PADILLA
SENATOR.PADILLA@SENATE.CA.GOV

California State Senate

SENATOR
STEPHEN C. PADILLA
EIGHTEENTH SENATE DISTRICT



COMMITTEES
BUDGET SUBCOMMITTEE #4 ON
STATE ADMINISTRATION AND
GENERAL GOVERNMENT
CHAIR
MEMBER
AGRICULTURE
BUDGET
GOVERNMENTAL ORGANIZATION
HOUSING
NATURAL RESOURCES AND WATER
REVENUE AND TAXATION

June 27, 2024

Filed: 01/27/2025

Document #2096840

USCA Case #25-1002

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Support for Alaska Airlines' Application for SAN-DCA

Dear Secretary Buttigieg:

As the California State Senator representing South San Diego County, I enthusiastically support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego, California and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotechnology, and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government-related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and has grown by more than 75% in the last 10 years. Today, that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

By providing this critical service to my constituents in South San Diego, I look forward to the increased access to travel options that will bridge them to our nation's capital and everything it has to offer. From visiting cultural and historical landmarks to accessing their federal representatives and resources, Alaska Airlines will also provide a critical resource to a community that is remotely far from where key policies are made that affects the whole nation.

I hope to hear of your favorable response to this request in the coming weeks. Should you have any questions, please do not hesitate to contact my office at (619) 409-7690. Thank you for your consideration.

Sincerely,

Senator Stephen C. Padilla
18th Senate District

CAPITOL OFFICE
1021 O STREET SUITE 7340
SACRAMENTO CA 95814
TEL 916.651.4038

DISTRICT OFFICES
169 SAXONY ROAD SUITE 200
ENCINITAS, CA 92024
TEL (760) 642.0809

24031 EL TORO ROAD SUITE 201A
LAGUNA HILLS, CA 92653
TEL (949) 598.5850

SENATOR BLAKESPEAR@SENATE.CA.GOV
WWW.SENATE.CA.GOV/BLAKESPEAR

California State Senate

SENATOR
CATHERINE BLAKESPEAR
THIRTY-EIGHTH SENATE DISTRICT



STANDING COMMITTEES
ELECTIONS AND CONSTITUTIONAL
AMENDMENTS
CHAIR

BUDGET AND FISCAL REVIEW

HOUSING

HUMAN SERVICES

TRANSPORTATION

SUBCOMMITTEES

LOSSAN RAIL CORRIDOR RESILIENCY
CHAIR

BUDGET SUBCOMMITTEE #2

RESOURCES, ENVIRONMENTAL PROTECTION
AND ENERGY

JOINT COMMITTEES

CLIMATE CHANGE POLICIES

FAIRS ALLOCATION & CLASSIFICATION

June 26, 2026

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

As a California State Senator representing parts of the County of San Diego, I enthusiastically advocate for the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This essential new route will not only facilitate relations between the two strategic regions, but will support the increasing demand for nonstop service for both business and leisure passengers as well.

Both San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. Because of their interrelatedness, San Diego's sectors in defense, biotech, and communications technology require efficient access to the core of the national capital region. The demand for access to institutions like the Pentagon and the Department of Homeland Security has significantly contributed to San Diego's achievement of the second largest government-related travel market in the nation.

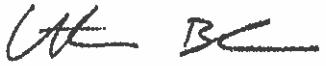
Yet at 225 passengers daily in each direction, not only is San Diego the largest origin-destination market without service to Reagan National, but the SAN-DCA market is the largest in the entire domestic network without nonstop service, as demonstrated by data from the U.S. Department of Transportation (DOT). The annual 180,000 passenger population between SAN and DCA has endured connections that add more than 360,000 hours annually of time inefficiency. Quick and reliable airline options between my home airport and Washington, D.C. are vitally important to the California Legislature's coordination with our federal partners. Additionally, their commitment to environmental values and implementation of low-waste standards on flights are important to me and all Californians and we would welcome their greater partnership.

Since Alaska Airlines began serving SAN in 1985, the airline has grown exponentially (by more than 75% in the last 10 years alone) and has developed a reputation for exceptional service, reliability, and customer satisfaction, making it the ideal carrier to bridge these two crucial markets. Today that means about 6,500 guests served daily and 60 average daily departures from SAN.

Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will result in enhanced connectivity between our communities, will fill a critical gap in the national air service network, and provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application and look forward to hearing your response to this request in the coming weeks.

Sincerely,



SENATOR CATHERINE BLAKESPEAR
SENATE DISTRICT 38

California State Senate

SENATE MINORITY LEADER BRIAN W. JONES
FORTIETH SENATE DISTRICT



June 20, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for nonstop service from SAN-DCA

Dear Secretary Buttigieg,

I am writing to offer my support for the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

I appreciate your consideration of this application. If you have any questions about my support, please do not hesitate to contact my office at 858-547-3818.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian W. Jones".

Brian W. Jones
Senator 40th District

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0078
(916) 319-2078
FAX (916) 319-2178

DISTRICT OFFICE
2700 ADAMS AVENUE, SUITE 102
SAN DIEGO, CA 92116
(619) 280-7801
FAX (619) 280-7806

E-MAIL
Assemblymember.Ward@assembly.ca.gov



COMMITTEES
CHAIR: HOUSING AND COMMUNITY DEVELOPMENT
BUDGET
LABOR AND EMPLOYMENT
LOCAL GOVERNMENT
PRIVACY AND CONSUMER PROTECTION
TRANSPORTATION

June 19, 2024

The Honorable Pete Buttigieg
Secretary of Transportation
United States Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C., 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

I am writing this letter in support of the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National).

San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security. This new route is crucial for enhancing the connectivity between the two strategic regions. It also supports the growing demand for nonstop service for both business and leisure passengers.

Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN.

Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and provide a more streamlined, efficient service that will benefit the greatest number of passengers. I am pleased to support Alaska Airlines' application for SAN-DCA nonstop air service.

Thank you for your consideration of this application.

Sincerely,

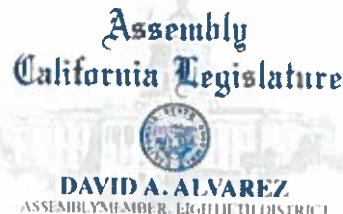


CHRISTOPHER M. WARD
Assemblymember, 78th District

CMW:am

STATE CAPITOL
PO. BOX 942849
SACRAMENTO, CA 94249-0080
(916) 319-2080
FAX (916) 319-2180

DISTRICT OFFICE
270 CHURCH AVENUE, SUITE D
CHULA VISTA, CA 91910
(619) 498-8560
FAX (619) 498-8508



COMMITTEES
CHAIR BUDGET SUBCOMMITTEE NO. 3 ON
EDUCATION FINANCE
BUDGET
EDUCATION
INSURANCE
MILITARY AND VETERANS AFFAIRS
WATER, PARKS, AND WILDLIFE

June 17, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

I am writing in support of Alaska Airlines' request to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is vital for supporting the growing demand for nonstop service for both business and leisure passengers as the SAN-DCA market is the largest in the entire domestic network without nonstop service.

As you may know, San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

The U.S. Department of Transportation (DOT) data demonstrates that San Diego is the largest origin-destination market without service to Reagan National. Alaska Airlines is the ideal carrier to bridge these two important markets as they began serving SAN in 1985 and in the last 10 years, has grown by more than 75% in daily passenger travel. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

Thank you for your consideration of this request.

Sincerely,

David Alvarez
Assemblymember, 80th District

STATE CAPITOL
PO. BOX 942849
SACRAMENTO, CA 94249-0079
(916) 319-2079
FAX (916) 319-2179
DISTRICT OFFICE
4700 SPRING STREET, SUITE 301
LA MESA, CA 91942
(619) 465-7903
FAX (619) 465-7909



COMMITTEES
APPROPRIATIONS
COMMUNICATIONS AND CONVEYANCE
HEALTH
HIGHER EDUCATION
WATER, PARKS, AND WILDLIFE
CO-CHAIR: ASSEMBLY LEGISLATIVE ETHICS
SELECT COMMITTEE
CHAIR: SOCIAL DETERMINANTS OF HEALTH

June 19, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. **DOT-OST-2024**.

Dear Secretary Buttigieg:

I write to enthusiastically support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink, appearing to read 'Akilah Weber'.

Akilah Weber, M.D.
Assemblymember, 79th District

STATE CAPITOL
PO BOX 942849
SACRAMENTO, CA 94249-0076
(916) 319-2076
FAX (916) 319-2176

DISTRICT OFFICE
12396 WORLD TRADE DRIVE, SUITE 118
SAN DIEGO, CA 92128
(858) 675-0760
FAX (858) 675-0688

E-MAIL
Assemblymember.Maienschein@assembly.ca.gov



Page 98 of 271

Filed: 01/27/2025

Document #2096840

USCA Case #25-1002

COMMITTEES
BANKING AND FINANCE
COMMUNICATIONS AND CONVEYANCE
HEALTH
JUDICIARY
RULES

SELECT COMMITTEES
CALIFORNIA'S MENTAL HEALTH CRISIS
MASTER PLAN FOR HIGHER EDUCATION
IN CALIFORNIA
SERVING STUDENTS WITH DISABILITIES

June 18, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024-

Dear Secretary Buttigieg:

I strongly support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government-related travel market – driven by demand to key institutions closest to DCA, including the Pentagon and the Department of Homeland Security.

At 225 passengers daily in each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop Alaska Airlines flight from SAN to DCA will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We hope to hear of your favorable response to this request in the coming weeks. Should you have any questions about this letter, please do not hesitate to contact my District Office.

Best Regards,

Brian Maienschein
Brian Maienschein
Assemblymember, 76th District

BM:km



NORA VARGAS
SUPERVISOR, FIRST DISTRICT
SAN DIEGO COUNTY BOARD OF SUPERVISORS

June 04, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

As Chairwoman of the San Diego County Board of Supervisors I strongly support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

I appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink that reads "Nora E. Vargas".

Serving the cities of
 El Cajon
 Poway
 Santee

Serving the
San Diego communities of
 Allied Gardens
 Carmel Mountain Ranch
 Del Cerro
 Granville
 Kearny Mesa
 MCAS Miramar
 Miramar Ranch
 Rancho Bernardo
 Sabre Springs
 San Carlos
 San Pasqual Valley
 Scripps Ranch
 Serra Mesa
 Stonebridge
 Tierrasanta

Serving the
County communities of:
 4S Ranch
 Alpine
 Barreto
 Blossom Valley
 Bostonia
 Boulevard
 Campo
 Crest
 Cuyamaca
 Dehesa
 Del Dios
 Descanso
 Dulzura
 Eucalyptus Hills
 Fernbrook
 Flinn Springs
 Granite Hills
 Guadalupe
 Harrison Canyon
 Jacumba
 Jamul
 Johnstown
 Julian
 Lake Hodges
 Lake Morena
 Lakeside
 Morena Village
 Mount Laguna
 Pine Hills
 Pine Valley
 Potrero
 Ramona
 San Diego Country Estates
 San Pasqual
 Santa Fe Valley
 Tecate
 Tierra del Sol
 Winter Gardens
 Wyndale

Serving the tribal
governments of
 Barona
 Campo
 Captain Grande
 Ewiitaapaayp
 Ingap-Cosumel
 Jamul Indian Village
 La Posta
 Manzanita
 Sycuan
 Viejas



JOEL ANDERSON

June 4, 2024

The Honorable Pete Buttigieg
 Secretary
 U.S. Department of Transportation
 1200 New Jersey Avenue, SE
 Washington, DC 20590

Re: Support for Alaska Airlines' application for SAN-DCA Nonstop Service

Dear Secretary Buttigieg:

I am writing to express my support for the application filed by Alaska Airlines to restore nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA). This route is vital for enhancing the connectivity between these two strategic regions and supporting the growing demand for nonstop service for both business and leisure passengers.

San Diego County and the Washington metropolitan area serve as significant defense-related economic hubs, with military spending accounting for over twenty-three percent of San Diego's gross regional product. The San Diego region, home to six Navy/Marine bases and one Coast Guard Air Station, remains the largest concentration of military assets in the world and the largest military workforce in the country. It is critical for our local military personnel and civilians working in the defense, biotech and communications technology, and related fields to have efficient access to our nation's capital and defense headquarters.

San Diego continues to rank as the second largest government-related travel market – driven by demand to key institutions closest to DCA, including the Pentagon and Department of Homeland Security. Department of Transportation (DOT) data, which identifies 225 passengers daily in each direction, demonstrates that San Diego is the largest origin-destination market lacking nonstop service to Reagan National Airport. The SAN-DCA market is also the largest in the entire domestic network without nonstop service, resulting in 360,000 hours annually of time inefficiency for the 180,000 passengers traveling between SAN and DCA each year.

The Honorable Pete Buttigieg

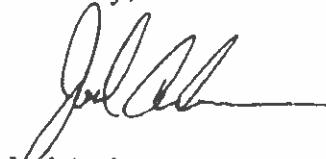
June 4, 2024

Page 2

I commend Alaska Airlines for recognizing the critical need for nonstop SAN-DCA service and for submitting its application to DOT to restore this important route. Adding nonstop DCA service to Alaska Airlines' daily destinations from SAN will greatly benefit our community by filling a critical gap in the national air service network, providing a more streamlined and efficient service that will benefit the greatest number of passengers.

Accordingly, I urge you to approve Alaska Airlines' application to reestablish nonstop SAN-DCA service and thank you in advance for considering my request.

Sincerely,



Joel Anderson
Supervisor, Second District

Document #2096840

USCA Case #25-1002

Page 102 of 271

Filed: 01/27/2025



TERRA LAWSON-REMER
SUPERVISOR THIRD DISTRICT
COUNTY OF SAN DIEGO BOARD OF SUPERVISORS

June 3rd, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024-

Dear Secretary Buttigieg:

As the County Supervisor representing San Diego County, District 3, I enthusiastically support Alaska Airlines' application to establish nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA).

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require direct and efficient access to our nation's capital and the surrounding communities. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

Department of Transportation data reveals that San Diego is the largest origin-destination market without service to Reagan National, with 225 passengers traveling each way daily. The SAN-DCA market is the largest in the entire domestic network without nonstop service, affecting 180,000 passengers annually and causing over 360,000 hours of travel inefficiencies. Just imagine how much more we could accomplish without those 360,000 hours lost each year!

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Terra Lawson-Remer
Supervisor, District 3
County of San Diego



MONICA MONTGOMERY STEPPE

SUPERVISOR, FOURTH DISTRICT
SAN DIEGO COUNTY BOARD OF SUPERVISORS

May 10, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

I enthusiastically support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers. We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Respectfully submitted,

Monica Montgomery Steppe
Supervisor, District Four
County of San Diego

1600 Pacific Highway, Room 335, San Diego, CA, 92101
Monica.MontgomerySteppe@sdcounty.ca.gov | (619) 531-5544



**JIM DESMOND
SUPERVISOR, FIFTH DISTRICT
SAN DIEGO COUNTY BOARD OF SUPERVISORS**

1600 PACIFIC HIGHWAY, ROOM 335, SAN DIEGO, CALIFORNIA 92101-2470

May 30, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

San Diego County Supervisor, Jim Desmond enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



JIM DESMOND
Supervisor, Fifth District



THE CITY OF SAN DIEGO
COUNCIL PRESIDENT SEAN ELO-RIVERA
NINTH DISTRICT

June 20, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

On behalf of Council District 9, I enthusiastically support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

I appreciate your consideration of this application. I hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Elo-Rivera".

Sean Elo-Rivera
Council President Elo-Rivera, San Diego City Council



**COUNCIL PRESIDENT PRO TEM JOE LACAVA
FIRST COUNCIL DISTRICT**

June 21, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

RE: Support for Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg,

I write to extend my support for Alaska Airlines' application to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan International). This newly proposed route is vital for enhancing the connectivity between the two strategic regions and supporting the growing demand by business and leisure passengers for nonstop service from SAN to DCA.

San Diego and Washington D.C. are centers of significant defense, economic, and tourism industries. San Diego's core sectors in defense, biotech, and communications technology require efficient access to the key institutions closest to DCA, including the Pentagon, Department of Homeland Security, and the U.S. Congress.

Data from the U.S. Department of Transportation demonstrates not only that San Diego is the largest origin-destination market without direct service to Reagan International, but the SAN-DCA market is the largest in the entire domestic network without nonstop service. This represents significant untapped potential for connectivity and growth between the two cities.

I respectfully request your consideration of Alaska Airlines' proposed nonstop service between San Diego International Airport and Ronald Reagan Washington National Airport. Please contact Victoria Joes, (VCJoes@sandiego.gov) of my office with any questions.

Thank you for your time and consideration.

Sincerely,



Council President Pro Tem Joe LaCava



**CITY OF SAN DIEGO
COUNCILMEMBER STEPHEN WHITBURN
THIRD DISTRICT**

June 18, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

As the Councilmember of District 3 in the City of San Diego, I am writing to enthusiastically support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

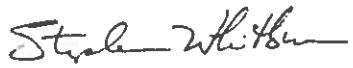
San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Thank You,



Stephen Whitburn
City of San Diego Councilmember, District 3



THE CITY OF SAN DIEGO

HENRY L. FOSTER III
COUNCILMEMBER • DISTRICT FOUR

June 21, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

I enthusiastically support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community and will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Henry L. Foster III
Councilmember, District Four
City of San Diego



THE CITY OF SAN DIEGO
MARNI VON WILPERT
COUNCILMEMBER • FIFTH DISTRICT

June 18, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

RE: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

On behalf of my constituents in San Diego's 5th Council District, I write to you in enthusiastic support of the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers traveling from the San Diego Metropolitan region to our Nation's Capital.

San Diego and Washington, D.C. are hubs of significant military, defense, economic, and social activity. San Diego's sectors in military readiness and defense, biotech, and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured mid-continental connections that add more than 360,000 hours annually of travel time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger



THE CITY OF SAN DIEGO
MARNI VON WILPERT
COUNCILMEMBER • FIFTH DISTRICT

community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink that reads "Marni von Wilpert".

Marni von Wilpert
San Diego City Councilmember, District 5



THE CITY OF SAN DIEGO
COUNCILMEMBER KENT LEE
SIXTH DISTRICT

June 14, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

San Diego Councilmember Kent Lee enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Personally, I make a few trips a year in my role as Chair of both Land Use and Housing and Budget and Government Efficiency Committees to advocate for San Diego's needs. This service would greatly improve these efforts and make it easy to expand them. We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A blue ink signature of Kent Lee.

Councilmember Kent Lee
Council District 6



THE CITY OF SAN DIEGO

RAUL A. CAMPILLO

COUNCILMEMBER • SEVENTH DISTRICT

June 20, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' Application for SAN-DCA

Dear Secretary Buttigieg:

As the Councilmember representing the Seventh District of the City of San Diego, I enthusiastically support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). As the largest market in the country not serviced by DCA, this new route is not only vital for enhancing the connectivity between the two strategic regions, but will also support the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and tourism industries. San Diego's core sectors in defense, biotech, and communications technology require efficient access to key institutions closest to DCA including the Pentagon, Department of Homeland Security, and the U.S Congress.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN.

Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network,

The Honorable Pete Buttigieg

-2-

June 20, 2024

and provide a more streamlined, efficient service that will benefit the greatest number of passengers.

Thank you for your consideration of this application.

Sincerely yours,



Raul A. Campillo

RAC:cs

Document #2096840

USCA Case #25-1002

Page 117 of 271

Filed: 01/27/2025



COUNCILMEMBER VIVIAN MORENO

EIGHTH DISTRICT
CITY OF SAN DIEGO

June 21, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

RE: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg,

On behalf of the Eighth Council District in the City of San Diego, please accept this letter of support for the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

The U.S. Department of Transportation (DOT) data states that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

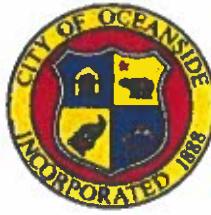
Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

For these reasons, I strongly support Alaska Airlines' application. Thank you for your consideration of this important matter and please feel free to contact me at (619) 236-6688 or vivianmoreno@sandiego.gov if you have any questions.

Sincerely,



Vivian Moreno
Councilmember, District Eight



Mayor Esther C. Sanchez, Esq.

May 29, 2024

The Honorable Pete Buttigieg
 U.S. Department of Transportation
 1200 New Jersey Ave, SE
 Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024-

Dear Secretary Buttigieg:

The City of Oceanside enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Delegations from our city travel to DC at least once a year for our annual meetings with federal representatives and other department representatives related to our city's critical projects, such as with the Army Corp of Engineers, U.S. Bureau of Reclamation, Department of the Interior, Housing and Urban Development, and others. City staff are also members of professional organizations with main offices and/or conferences in DC. With direct flights, we would be able to travel much more frequently.

Office of Mayor Esther C. Sanchez • City of Oceanside • 300 N. Coast Hwy, Oceanside, CA 92054
 (760) 435-3057 • ESanchez@OceansideCA.org

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

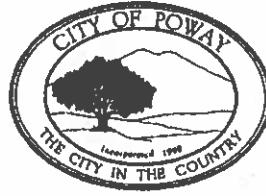
We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Best regards,



Esther C. Sanchez, Mayor
City of Oceanside

CITY OF POWAY



STEVE VAUS, Mayor
CAYLIN FRANK, Deputy Mayor
PETER DE HOFF, Councilmember
ANITA EDMONDSON, Councilmember
BRIAN PEPIN, Councilmember

May 29, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024

Dear Secretary Buttigieg:

The City of Poway enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN.

Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network and provide a more streamlined, efficient service that will benefit the greatest number of passengers.

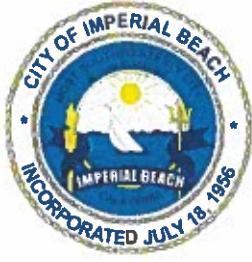
We appreciate your consideration of this application and hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature of Steve Vaus.

Steve Vaus
Mayor

City Hall Located at 13325 Civic Center Drive
Mailing Address: P.O. Box 789, Poway, California 92074-0789
www.poway.org



CITY OF IMPERIAL BEACH

OFFICE OF THE MAYOR

PALOMA AGUIRRE, MAYOR

825 IMPERIAL BEACH BLVD., IMPERIAL BEACH, CA 91932

TEL: 619.423.8303 | FAX: 619.628.1395

May 31, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

As Mayor of the City of Imperial Beach, I enthusiastically support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

Our San Diego region and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Paloma Aguirre
Mayor, City of Imperial Beach



MAYOR JOHN McCANN

May 30, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024-

Dear Secretary Buttigieg:

The City of Chula Vista enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in blue ink that reads "John McCann".

John McCann
Mayor
City of Chula Vista

**MAYOR & CITY COUNCIL**

John B. Franklin
Mayor

Katie Melendez
Deputy Mayor

Joe Green
Councilmember

Corinna Contreras
Councilmember

Dan O'Donnell
Councilmember

CITY MANAGER

John Conley

June 3, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024

Dear Secretary Buttigieg:

The City of Vista enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink that reads "John B. Franklin".

John B. Franklin
Mayor
City of Vista



CITY OF SOLANA BEACH

635 SOUTH HIGHWAY 101 • SOLANA BEACH, CA 92075 • (858) 720-2400 • Fax (858) 720-2455

www.cityofsolanabeach.org

June 3, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

The City of Solana Beach enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink that appears to read "Lesa Heebner".

Lesa Heebner
Mayor



Dane M. White, Mayor
201 North Broadway, Escondido, CA 92025
Phone: 760-839-4683
E-mail: dane.white@escondido.gov

June 3, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024

Dear Secretary Buttigieg:

The City of Escondido enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

The Honorable Pete Buttigieg
June 3, 2024
Page 2

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Dane M. White
Mayor



SAN MARCOS

DISCOVER LIFE'S POSSIBILITIES

Office of Mayor Rebecca Jones
rjones@san-marcos.net

June 14, 2024

Page 129 of 271

Filed: 01/27/2025

Document #20996840

USCA Case #25-1002

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

As Mayor of the City of San Marcos, I enthusiastically support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Rebecca Jones
Mayor
City of San Marcos

www.san-marcos.net

CITY OF SAN MARCOS, CALIFORNIA

1 Civic Center Drive | San Marcos, CA 92069 | (760) 744-1050



ALASKA AIRLINES MEC AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

18000 International Blvd., Suite 300 | Seattle, WA 98188 | 206-241-3138 | Fax 206-241-3908

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Page 130 of 271

Filed: 01/27/2025

Document #2096840

USCA Case #25-1002

May 31, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA service.

Dear Secretary Buttigieg,

We are writing on behalf of Alaska Airlines' pilots in support of our airline's application to provide new daily roundtrip flights to Washington Reagan National Airport (DCA) originating from San Diego International Airport (SAN).

Alaska Airlines is a financially strong carrier with hard-working, dedicated employees. Alaska Airlines has a proven track record of exceptional customer service and operational reliability. These factors speak to Alaska Airlines' ability to provide maximum consumer benefits to SAN-DCA nonstop travelers.

The San Diego and Southern California region has been a long-time priority for Alaska Airlines and is an ideal candidate for nonstop service. San Diego is currently the largest market to Washington, D.C. without a nonstop route to DCA. A direct route from SAN to DCA will allow Southern California residents, particularly those in the San Diego metropolitan region, to benefit from enhanced competition, and they no longer will be forced to use less convenient, more time-consuming service to reach our nation's capital.

Alaska Airlines is ideally suited to provide this service. Alaska and its regional sister carrier Horizon Air have a large presence at SAN, operating an annual average of 60 departures per day to destinations up and down the West Coast and Hawaii. As a result, Alaska's nonstop flight would also improve service levels to Washington, D.C., not only for San Diego area passengers, but for connecting passengers and the entire California region.

Since 1985, Alaska Airlines has been growing its presence in San Diego, recently adding new nonstop destinations to its SAN network. Alaska serves the most destinations of any airline in San Diego and has grown by more than 75 percent in the last 10 years, providing competition to other carriers in this market. Alaska Airlines is also engaged in the regional community and

partners with several business and non-profit organizations, including serving as the official airline sponsor of San Diego State University athletics and Snapdragon Stadium. Awarding this new route will also allow Alaska to continue to grow, compete, and create more jobs at one or more of our four pilot domiciles in Alaska, Washington, Oregon, and California.

We respectfully urge you to grant Alaska Airlines an application to provide SAN-DCA service. Thank you for your consideration.

Sincerely,

Alaska Airlines Master Executive Council

Capt. Will McQuillen
MEC Chairman

Capt. Garin
Tentschert
MEC Vice Chairman

Capt. Dan Richards
MEC Treasurer

Capt. Scott Rubin
MEC Secretary

Capt. Robert Lane
ANC LEC Chairman

Capt. Bruce Sherry
ANC LEC Vice-Chair

F/O Steven Bush
ANC LEC Secretary-Treasurer

Capt. Matt Richardson
PDX LEC Chairman

F/O Scott Horning
PDX LEC Vice-Chair

F/O Sara Gamblin
PDX LEC Secretary-Treasurer

Capt. Arna Harris
SFO LEC Chair

F/O John Owens
SFO LEC Vice-Chair

Capt. Sam Quady
SFO LEC Secretary-Treasurer

Capt. Brendan Harkin
LAX LEC Chairman

F/O Robin Kim
LAX LEC Vice-Chair

F/O Nicholas Markham
LAX Secretary - Treasurer

Capt. Tony Lind
SEA LEC Chairman

Capt. Michael Headt
SEA LEC Vice-Chair

Capt. Steve Savage
SEA LEC S/T

Capt. Chad Rabinowitz
SEA LEC Block Rep



AIRCRAFT MECHANICS FRATERNAL ASSOCIATION

National Office: 7853 E. Arapahoe Court, Suite 1100 • Centennial, CO 80112
Tel: 303.752.AMFA (2632) • Fax: 303.362.7736

Page 132 of 271

Filed: 01/27/2025

Document #20996840

USCA Case #25-1002

May 24, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Alaska's application for SAN-DCA service

Dear Secretary Buttigieg:

On behalf of the Aircraft Mechanics Fraternal Association (AMFA), the union that represents the technicians in the service of Alaska Airlines, I am writing in support of the application of Alaska Airlines to provide one daily roundtrip flight between Washington Reagan National Airport (DCA) and San Diego International Airport (SAN).

Alaska Airlines has a proven track record of strong customer service and operational reliability, which is a testament to the hard work and dedication of its employees. Alaska Airlines is ideally suited to provide this service. Alaska and its regional sister carrier Horizon Air have a large presence at SAN, operating an annual average of 60 departures per day to destinations up and down the West Coast and Hawaii. As a result, Alaska's nonstop flight would also improve service levels to Washington, D.C., not only for San Diego area passengers, but for connecting passengers and the entire California region. These factors speak to Alaska Airlines' ability to provide maximum consumer benefits to travelers through this new DCA route.

The San Diego and Southern California region has been a long-time priority for Alaska Airlines and is an ideal candidate for nonstop service. San Diego is currently the largest market to Washington, DC without a nonstop route to DCA. A direct route from SAN to DCA will allow Southern California residents, particularly those in the San Diego metropolitan region, to benefit from enhanced competition and they no longer will be forced to use less convenient, more time-consuming service to reach our nation's capital.

Since 1985 Alaska Airlines has been growing its presence in San Diego, recently adding new nonstop destinations to its SAN network. Alaska serves the most destinations of any airline in San Diego and grown by more than 75% in the last 10 years providing competition to other carriers in this market. Alaska Airlines is also engaged in the regional community and partners with a number of business and non-profit organizations, including serving as the official airline sponsor of San Diego State University athletics and Snapdragon Stadium.

Finally, awarding this new route will also allow Alaska to continue to grow, compete, and create more jobs. On behalf of AMFA members, hardworking Alaska Airlines employees, I respectfully urge you to grant Alaska Airlines' application to provide SAN-DCA service. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert B. Cusick".

Director of Government Affairs – AMFA



San Diego and Imperial Counties Labor Council

June 4th 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024-

Dear Secretary Buttigieg:

The San Diego & Imperial Counties Labor Council and the San Diego County Building Trades Council enthusiastically support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, labor and social activity. San Diego's working families' organizations and their more than 200,000 members in the region require efficient access to the capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the House of Representatives and the White House, the Department of Health and Human Services, Department of Commerce, Department of Transportation and the myriad of agencies that are tasked with implementing federal legislation that directly impact our national affiliates.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink that reads "Brigette R".

Brigette Browning
Secretary-Treasurer
San Diego & Imperial



Metropolitan Transit System

June 4, 2024

The Honorable Pete Buttigieg
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: Alaska Airlines Application for SAN-DCA

Dear Secretary Buttigieg,

San Diego Metropolitan Transit System (MTS) enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink that reads "Sharon Cooney".

Sharon Cooney
Chief Executive Officer

1255 Imperial Avenue, Suite 1000, San Diego, CA 92101-7490 • (619) 231-1466 • sdmts.com

San Diego Metropolitan Transit System (MTS) is a California public agency comprised of San Diego Transit Corp., San Diego Trolley Inc. and San Diego and Arizona Eastern Railway Company (nonprofit public benefit corporations). MTS member agencies include the cities of Chula Vista, Coronado, El Cajon, Imperial Beach, La Mesa, Lemon Grove, National City, Poway, San Diego, Santee, and the County of San Diego. MTS is also the For Hire Vehicle administrator for nine cities.





July 2, 2024

The Honorable Pete Buttigieg
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024-0065

Dear Secretary Buttigieg:

The San Diego County Regional Airport Authority, operator of San Diego International Airport (SAN) is pleased to support the application of Alaska Airlines for nonstop service between SAN and Ronald Reagan Washington National Airport (DCA). San Diego has the largest unserved passenger market demand to DCA – more than 30% higher than the next largest unserved market. Additionally, at approximately 225 daily passengers each way, SAN-DCA is the largest unserved airport pair in the entire country.

San Diego has highly diverse business relationships with Washington, DC. San Diego is home to key industrial clusters such as health science, mobile telecommunications, and national defense. These clusters collaborate frequently with private industry and regulatory bodies in the Nation's Capital. Convention and leisure travelers in both regions could benefit from quick and convenient access between SAN and DCA, significantly reducing downtown to downtown travel times. One cannot underestimate the efficiencies gained by having the closest airport to the Pentagon linked nonstop to the closest airport to Navy Region Southwest headquarters. Both installations are situated 3 miles from their respective airports.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. This nonstop flight will fill a critical gap in the national air service network and provide a more efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Kimberly J. Becker
President / CEO



June 14, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

The San Diego Unified Port District (Port) enthusiastically supports Alaska Airlines' application to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route enhances the connectivity between the two strategic regions and supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are defense, economic, and social hubs. San Diego's defense, biotech, and communications technology sectors require efficient access to the core of the national capital region. San Diego is the second largest government-related travel market – driven by demand for key institutions closest to DCA, including the Pentagon, the Department of Transportation (DOT), and Department of Homeland Security (DHS).

At 225 passengers daily in each direction, not only does DOT data demonstrate that San Diego is the largest origin-destination market without service to Reagan National. The annual 180,000 passenger population between SAN and DCA has endured connections that add more than 360,000 hours annually of time inefficiency.

The Port of San Diego team has worked closely with our partners in the federal government to advance clean transportation, port infrastructure investments, maritime and harbor security, invasive species management and eradication, regional investments to address cross-border pollution, and many other initiatives. Adding a direct connection between our cities benefits our ongoing collaboration and joint leadership in these areas.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction makes it the ideal carrier to bridge these two important markets. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Nelson".

Job Nelson
Vice President of Strategy and Policy



750 B Street, Suite 1500
San Diego, CA 92101

SANDIEGO.ORG

Page 137 of 271

Filed: 01/27/2025

Document #2096840

USCA Case #25-1002

May 23, 3024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 2059

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024

Dear Secretary Buttigieg,

The San Diego Tourism Authority, which is a private non-profit organization dedicated to promoting San Diego as a world-class travel destination, enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market and is driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National and the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Furthermore, the lack of a direct flight option severely impacts the business travel sector, which is a crucial component of both cities' economies. This new service would be a welcome option for business travelers bound for San Diego. Currently, travelers from the D.C. Metro area bound for San Diego face lengthy commutes of 45 minutes or more to reach other hubs like Dulles and BWI, not to mention inconvenient stopover flights that can add hours to travel times. This is especially burdensome for more than 1,000 non-profit associations and numerous government agencies headquartered in our nation's capital, which accounts for tens of thousands of



attendees traveling to conferences and meetings in San Diego. A SAN-DCA service will allow these organizations to maximize productivity by minimizing unnecessary stress as a result of potential delays and missed connecting flights.

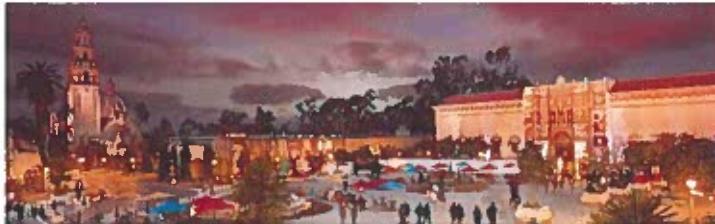
Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Julie Coker
President & CEO
San Diego Tourism Authority



June 3, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. **DOT-OST-2024-**

Dear Secretary Buttigieg:

California Travel Association (CalTravel) enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Since 1981, CalTravel has been the influential and unified voice of advocacy for the travel and tourism industry in California. We also serve on the board of the U.S. Travel Association and advocate on a federal level for the travel and tourism industry. We strongly believe that approving Alaska Airlines to add this new route will positively impact both business and leisure travel.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests

served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Barbara Newton,
President & CEO
California Travel Association



402 West Broadway Suite 1000
San Diego, CA 92101-3585
p. 619.544.1300

www.sdchamber.org

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Filed: 01/27/2025

Document #20996840

USCA Case #25-1002

May 30, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Subject: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

On behalf of the San Diego Regional Chamber of Commerce (Chamber) and the over 2,000 members and over 300,000 employees we represent, I am writing to express our enthusiastic support for Alaska Airlines' application to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

The Chamber has long been a proud advocate for establishing direct routes between SAN and DCA. We recently embarked on our annual delegation trip to Washington D.C. this April, where we were joined by over 170 delegates including business leaders, community leaders, and elected officials. Advocating for a direct connection between our region and the nation's capital was a top priority for our delegation this year, and we expressed the dire need to create this direct route during a meeting we held with the Department of Transportation. A direct route between SAN and DCA will unlock more economic opportunities for San Diego and will promote future economic growth and prosperity for our region.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it an ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last

10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

The Chamber proudly supports Alaska Airlines' application, and kindly requests your support. We appreciate your consideration of this application and hope to hear of your favorable response to this request in the coming weeks. Should you have any questions, please do not hesitate to contact Justine Murray, Executive Director of Public Affairs, at jmurray@sdchamber.org.

Sincerely,



Jerry Sanders
President & CEO



May 30, 2024

Page 143 of 271
The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Filed: 01/27/2025
Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024-

Dear Secretary Buttigieg:

The San Diego Regional East County Chamber of Commerce enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

Document #2096840
San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

USCA Case #25-1002
At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rick Wilson".

Rick Wilson
President & CEO
San Diego Regional East County Chamber of Commerce



Page 144 of 271

Filed: 01/27/2025

Document #2096840

USCA Case #25-1002

Chris Thorne
Chief Executive Officer
North San Diego Business Chamber
10875 Rancho Bernardo Rd, Suite 104
San Diego, CA 92127

April 26, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024- (PENDING)

Dear Secretary Buttigieg:

I write to you today on behalf of the more than 800 represented employers, and more than 300,000 represented employees of the North San Diego Business Chamber to enthusiastically support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

The North San Diego Business Chamber, it's leadership, and it's Members, are intimately familiar with the challenges that current service routes impose on reasonable travel, and ultimately, the diminished voice of the business community in the seat of our National government due to lack of adequate and reasonable business travel routes.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will

mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Chris Thorne
CEO, North San Diego Business Chamber
chris@sdbusinesschamber.com



May 31, 2024

Page 146 of 271

Filed: 01/27/2025

Document #20996840

USCA Case #25-1002

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024

Dear Secretary Buttigieg:

The San Diego County Lodging Association supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

This places San Diego at a competitive disadvantage compared to other cities with direct access in the following areas:

Economic Growth – In general, commerce thrives when it has access to a more reliable and faster logistics options. Improved connectivity can attract business and investment opportunities fostering economic development. Along with direct government opportunities, there are also indirect opportunities that having a direct flight could facilitate. Due to its role as the political and regulatory hub, Washington DC is home to over 2,000 industry and trade associations representing a variety of industries, whom at this point, have not had direct access to San Diego.

Tourism and Hospitality – Direct flights can boost tourism by making it easier for travelers to visit the connected cities. This increased activity generates employment opportunities in hotels, restaurants, and local attractions.

These impacts are significant for San Diego. Currently, the total economic impact of travel to San Diego is \$22 billion dollars. This supports close 9,500 businesses that employ 1-in-8 San Diegans.

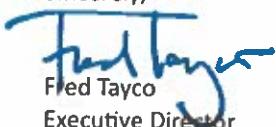
-CONTINUED-

PAGE 2
SUBJECT: SDCLA Support of Alaska Airlines Application for SAN-DCA

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Fred Tayco
Executive Director
San Diego County Lodging Association

May 22, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA service

Dear Secretary Buttigieg:

San Diego Regional Economic Development Corporation (EDC) enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

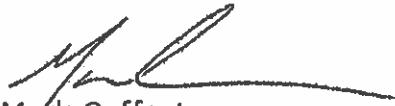
Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop SAN to DCA option to Alaska Airlines' daily destinations will mean increased connectivity for our larger community, will fill a critical gap in the national air service

REGIONALLY
FOCUSED.
GLOBALLY
COMPETITIVE.

network, and will also provide a more streamlined, efficient service benefitting the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Mark Cafferty
President & CEO



San Diego East County Economic Development Council

June 1, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

The East County Economic Development Council enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Local San Diego businesses and stakeholders would benefit from direct flights to and from DC by gaining easier access to important government and business centers, facilitating efficient communication, fostering new partnerships, and increasing opportunities for economic growth and development. As an economic development council, the East County Economic Development Council maintains strong connections with local businesses and stakeholders, ensuring their needs and priorities are well-represented. The increased accessibility would lead to tangible benefits such as enhanced business relationships, improved productivity, and boosted economic activity. Additionally, feedback from local businesses and stakeholders has indicated a strong demand for direct flights to and from DC to support their operations and growth opportunities.

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Filed: 01/27/2025

Document #20996840

USCA Case #25-1002

127 East Lexington Avenue
El Cajon, CA 92020
P. (619) 258-3670
F. (619) 258-3674
www.eastcountyedc.org



San Diego East County Economic Development Council

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink that reads "James Sly".

James Sly
President and CEO
East County Economic Development Council

Page 151 of 271

Filed: 01/27/2025

Document #2096840

USCA Case #25-1002

127 East Lexington Avenue
El Cajon, CA 92020
P. (619) 258-3670
F. (619) 258-3674
www.eastcountyedc.org



May 31, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024-

Dear Secretary Buttigieg:

The South County Economic Development Council enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

The South County Economic Development Council (SCEDC) is dedicated to fostering economic growth and enhancing the quality of life in the region. By encouraging private investment and promoting diversified residential and business development, SCEDC aims to create a vibrant and sustainable community. The council actively publicizes the area's rich cultural, educational, social, and geographical opportunities, serving as a strong advocate for both public and private interests. Additionally, SCEDC promotes bi-national business growth, working closely with the Economic Development Administration (EDA) and other federal agencies to attract investment and build a resilient workforce, ensuring long-term prosperity for the region.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.



We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Jim O'Callaghan
President and CEO
South County Economic Development Council



The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

July 2, 2024

Dear Secretary Buttigieg:

Imperial Valley Economic Development Corporation enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Imperial Valley Economic Development Corporation is a partnership of private enterprise and local government that is united by the common vision to expand and diversify our economy. Our investors include a host of public and private organizations that benefit from the growth of our regional economy. The Imperial County has a thriving agricultural industry of over \$2.6 billion annually and we are the second largest in renewable energy generation by County in the State of California. With the new Lithium Industry starting in our region, our connection to Washington, D.C. is more important than ever before. Having this new nonstop air service route would allow our regions representatives, officials and leaders to efficiently conduct business to further improve our county.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. A percentage of those guests are Imperial County residents as SAN is their preferred airport due to its proximity. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our communities, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in blue ink that reads "Timothy E. Kelley".

Timothy E. Kelley
President & CEO
Imperial Valley Economic Development Corporation

DOWNTOWN
SAN DIEGO
PARTNERSHIP

May 31, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. **DOT-OST-2024-**

Dear Secretary Buttigieg:

The Downtown San Diego Partnership (DSDP) enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security. Additionally, with recent news of both San Diego and Washington, D.C. announcing their respective Zoos to have Giant Pandas, this new route will further connect two tourist destinations.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

For over three decades, the DSDP has remained committed to bolstering the economic prosperity and cultural vitality of Downtown. Our organization has successfully operated the Downtown Property and Business Improvement District for the past two decades implementing various measures to enhance maintenance, safety, and the overall vibrancy of the district. DSDP is also the managing organization for the City Center Business Improvement District which includes over 730 business in 53 blocks.

Having efficient transportation for local residents and tourists to a variety of destinations is especially critical for the downtown community, given its high density of housing, job opportunities, and popular tourist destinations. SAN's proximity to the Downtown community is not just beneficial to our residents, workforce, and tourists, but also to the whole San Diego – Tijuana region.

DOWNTOWN
SAN DIEGO
PARTNERSHIP

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Besty Brennan
Downtown San Diego Partnership



May 30, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Sports San Diego enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

As San Diego's sports commission responsible for producing economic impact for the region, Sports San Diego is heavily dependent on our ability to travel throughout the country to proactively recruit world-class sporting events to San Diego. Alaska Airlines' exceptional reputation and service in the tourism industry makes them a perfect candidate to open new service to DCA.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding



a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Mark Neville

Mark Neville (May 30, 2024 14:51 PDT)

Mark Neville
CEO, Sports San Diego

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DOLE FRESH FRUIT CO.
Sean Clancy, Vice Chair
SHERATON SAN DIEGO HOTEL & MARINA
Sharon Bernie-Cloward, President
SAN DIEGO WORKING WATERFRONT
Sophie Silvestri, Secretary
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DRISCOLL INC.
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MOFFATT AND NICHOL
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Brad Engel
FLAGSHIP CRUISES & EVENTS
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UNROAD ENTERPRISES
Jim Garegnani
SOLAR TURBINES
Bill Harju
PACIFIC MARITIME GROUP
Kip Howard
ALLEGIS DEVELOPMENT
Eric Icke
DIE SYSTEMS SAN DIEGO SHIP REPAIR
Brian Jones
GENERAL DYNAMICS NASSCO
Devor Jones
CONTINENTAL MARITIME OF SAN DIEGO
Dave Koontz
USS MIDWAY MUSEUM
Daniel Kuperschmid
MANCHESTER GRAND HYATT SAN DIEGO
John Laun
SAN DIEGO YACHT CLUB
Eric Leslie
BIRBON ISLAND WEST MARINA
Jonathan Litvack
ORONODO ISLAND MARRIOTT
Nicole Macdour-Mast
RESIDENCE INN & SPRINGHILL SUITES SAN DIEGO
DOWNTOWN BAYFRONT
Ruben Mora
NA MARINE
Dissa Murray
UNSF RAILWAY
Scott Ostrander
MONA KAI RESORT
Kate Pearson
SAFE HARBOR SHELTER ISLAND, SUNRISE, CABRILLO
Frank Plant
HARBORSIDE
D.P. "Sandy" Purdon
SHELTER COVE MARINA
Todd Roberts
MARINE GROUP BOAT WORKS
Scott Schepers
STRATEGIC LAW
Scott Siebert
DYLORD PACIFIC RESORT & CONVENTION CENTER
Jimmy Silveria
CHULA SEAFOOD
Frank Ursitti
H&M LANDING
DIRECTORS EMERITUS
Ken Franke
Edward Plant

STAFF & CONSULTANT

Summer Benton
DIRECTOR, MEMBERSHIP, EVENTS & SOCIAL MEDIA
Irene McCormack
DIRECTOR, PUBLIC POLICY
Aimee Fauckett, Consultant
AGENDA SETTING LLC



June 2, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024

Dear Secretary Buttigieg:

The San Diego Working Waterfront enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 480,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and provide

The Honorable Pete Buttigieg
U.S. Department of Transportation
June 2, 2024
Page 2

a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Sharon Cloward
President & CEO
San Diego Working Waterfront

May 30, 2024

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Filed: 01/27/2025

Document #20996840

USCA Case #25-1002

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

On behalf of the San Diego Convention Center Corporation, I write to express our support for the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is vital for enhancing the connectivity between two strategic regions and supports the growing demand for nonstop service for both business and leisure passengers.

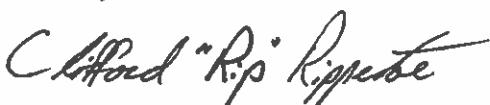
This route is particularly important for group business travel because San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. Similarly, many trade associations within these sectors prefer to hold conventions, trade shows, and conferences at the San Diego Convention Center because of our proximity to these industries locally. Furthermore, many meeting planners are based in Washington, D.C., and stand to benefit from nonstop service between both destinations. By streamlining travel to conventions and other professional gatherings, this new route will support collaboration, research, and innovation across critical industries.

San Diego is the second largest government-related travel market – driven by demand to key institutions closest to DCA, including the Pentagon and Department of Homeland Security. At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines began serving SAN in 1985 and, in the last 10 years, has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will increase connectivity for our larger community, fill a critical gap in the national air service network, and provide a more streamlined, efficient service that will benefit the greatest number of passengers.

Thank you for your consideration of this application.

Sincerely,



Clifford "Rip" Rippetoe, CVE
President and CEO
San Diego Convention Center Corporation



The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg,

The Asian Business Association of San Diego is pleased to support Alaska Airlines' application for direct service connection from San Diego International Airport (SAN) to Washington, D.C.'s Reagan National Airport (DCA).

Today, there are more than 33,000 Asian and Pacific Islander (API) owned businesses throughout San Diego County. Our research has found API-owned businesses generated \$5 billion in regional economic impact, a significant figure that underscores the sales activity and revenue from these businesses. Their continued success depends on expanding opportunities and access to other markets across the country.

As the single largest market in the United States *without* nonstop service to DCA, San Diego would benefit immensely from this new route, allowing San Diegans a more efficient connection to our nation's capital and simultaneously, providing direct access on Alaska Airlines' diverse routes, creating new opportunities for economic growth as individuals connect through San Diego.

San Diego is the second largest government-related travel market, driven by the demand for convenient access to key institutions including the Pentagon and Department of Homeland Security. Both San Diego and Washington, D.C. serve as crucial centers for defense, economic and social activities. San Diego's thriving defense, biotech and communications technology sectors require seamless and efficient access to the center of the nation's capital region.

This new service will allow for the continued expansion of San Diego's nearly \$300 billion regional economy and the 1.6 million jobs. This includes the nearly \$20 billion the San Diego region received last year in direct Department of Defense contracts, and the resulting 355,000 jobs and \$56 billion in economic impact. This level of spending allows our small and minority owned businesses to thrive.

For these reasons, we are pleased to support this application and urge your approval. If you have any questions, please feel free to contact me at jason@abasd.org or (858) 277-2822.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Paguio'.

Jason Paguio
President & CEO



May 23, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

The California Hispanic Chambers of Commerce (CHCC) enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, but the SAN ALSO-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,


JULIAN CANETE
President & CEO



**CALIFORNIA AFRICAN AMERICAN
CHAMBER OF COMMERCE**

May 29, 2024

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Director

Dail St. Claire
St. Claire Consultants

Filed: 01/27/2025

Document #20996840

USCA Case #25-1002

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

The California African American Chamber of Commerce enthusiastically supports Alaska Airlines' application to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is vital for enhancing the connectivity between the two strategic regions and supporting the growing demand for nonstop service for business and leisure passengers.

San Diego and Washington, D.C., are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech, and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government-related travel market, driven by demand for key institutions closest to DCA, including the Pentagon and Department of Homeland Security.

At 225 passengers daily in each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, but the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction makes it the ideal carrier to bridge these two critical markets. Alaska Airlines began serving SAN in 1985 and has grown by more than 75% in the last ten years. Today means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, fill a critical gap in the national air service network, and provide a more streamlined, efficient service that will benefit the most significant number of passengers.

Sincerely,

Ahmad Holmes

**Ahmad R. Holmes, MBA
President & CEO
California African American Chamber of Commerce**



May 30, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Cyber Center of Excellence (CCOE) enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

Now celebrating 10 years of service to the San Diego cyber community, CCOE maintains strong ties to Washington, D.C. and was highlighted as an "Ecosystem in Action" in the White House National Cyber Workforce & Education Strategy report. CCOE is currently working with the White House ONCD and CISA to organize San Diego innovation tours, and we're partnering with the Joint Cyber Defense Collaborative (JCDC) on their cyber resources map with CISA that will feature CCOE and San Diego's efforts as part of the White House Ecosystems in Action highlight. Maintaining strong connections between San Diego and Washington, D.C. is essential for fostering collaboration, innovation, economic prosperity, and national security.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security. Adding an Alaska Airlines' nonstop flight to DCA from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa Easterly'.

Lisa Easterly
President & CEO, Cyber Center of Excellence



June 12, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

NAIOP San Diego enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Karen Burges
Chief Operating Officer
NAIOP San Diego

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Hines
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Eric Shupes
Hines
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Erica Stroh
Westgate
Matt Trahan
105 Real Estate Group
George Tzortzis
Southern Properties

Developing Leader Co-Chairs

Karen Burges
Eric Hepter
Tanner Clark
URBAN



May 29, 2024

401 WEST A STREET
SUITE 200
SAN DIEGO, CA 92101
858-568-7777

cleantechsandiego.org

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

RE: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024-

Dear Secretary Buttigieg:

On behalf of Cleantech San Diego please accept this letter of support for the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

MISSION:
To accelerate clean technology innovation and promote the equitable deployment of sustainable solutions across the San Diego region for the benefit of the economy, the environment, and all members of the community.

Cleantech San Diego is a member-based business organization founded 16 years ago that positions the San Diego region as a leader in the cleantech economy by fostering collaborations across the private-public-academic landscape, engaging in advocacy efforts to promote cleantech priorities, supporting energy entrepreneurs through the Southern California Energy Innovation Network, and encouraging more equitable investment across the San Diego region. For well over a decade, Cleantech San Diego has partnered extensively with SAN on strategic initiatives that benefit of the economy, the environment, and all members of the community.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, cleantech, biotech, and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

We appreciate your consideration of this application.

Sincerely,

Jason Anderson
President and CEO
Cleantech San Diego

May 29, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

San Diego Sport Innovators enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

SDSI is a sport, Active and Healthy living business development organization, chaired by the late legendary, Bill Walton. Our daily business activities touch the vital industries and segments here in San Diego, including the 1.3 million active duty, retired and military families as well as the Pro Sport teams and their fans. Military and tech industries are crucial to the nation, making a direct flight to Reagan National Airport a logical necessity. As a San Diegan, I can confidently say there is no better destination for outbound travelers than San Diego. Our sunny beaches and So Cal charm are the perfect antidote to Washington DC!

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Bob Rief

Executive Director, SDSI

Bill Walton

Chairman Emeritus



June 18, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

SeaWorld San Diego enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

Travel related to tourism is what is most important to SeaWorld and San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security. Furthermore, San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Aviation is indispensable for tourism, and it relies on tourism to generate demand and fill seats. In 2023, U.S. airlines carried 819.3M passengers domestically while 66.5M international visitors arrived in the United States by air. California was the third most visited location for international travelers. Although these numbers are significant, international air travel has not reached pre-pandemic levels and we seek to encourage every opportunity to make travel seamless and recover each sector of tourism.

Tourism is a major contributor to our local and regional economy. According to the San Diego Tourism Authority, in 2023, total direct visit spending contributed \$14.23B to the local economy and the well-being of San Diego's communities. The tourism industry supported more than 214,000 direct and indirect jobs and hotel stays drove more than \$418 million in transient occupancy tax (TOT) revenue for local municipalities.

The impact of tourism can be even more profound with new air services increasing the propensity to travel. Although it is not considered a traditional low-cost carrier, Alaska Airlines offers saver fares and is one of the most affordable non-budget airlines. Direct flight between SAN and DCA allows for greater access to those traveling on a budget to enjoy San Diego providing an additional social impact. It also is beneficial that Alaska Airlines has a reputation for exceptional service, reliability, and customer satisfaction, making it the ideal carrier to bridge these two important markets.

SeaWorld relies on local, statewide, national and international visitors. Well-functioning borders, airports and ports are essential to our park's success. Adding a non-stop flight opportunity from such an important city as Washington D.C. will be another enhancement to the affordability and convenience of our San Diego location.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Tyler Carter
Park President
SeaWorld San Diego

June 27, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Lockheed Martin enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Mark Stansbury
Senior Manager, Global Travel
Lockheed Martin Corporation

June 14, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. **Alaska Airlines SAN-DCA**

Dear Secretary Buttigieg:

General Atomics enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Mary Motycka

General Atomics

Mary.motycka@google.com



Qualcomm Incorporated

5775 Morehouse Drive, San Diego, CA 92121

www.qualcomm.com

June 11, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

On behalf of Qualcomm, I am writing to express our enthusiastic support for Alaska Airlines nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, but the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

SAN - Washington DC is among Qualcomm's top 10 domestic travel markets. Flying nonstop to DCA from SAN would be a considerable improvement over our current Travel options, which require layovers that can result in travel delays, or additional transportation costs and time for our travelers between IAD and the metro DC area.

Qualcomm has had a long and successful relationship with Alaska Airlines, which is designated as a Qualcomm Preferred Airline for our employees. We can attest to Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction, and believe it would be the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily, including many Qualcomm employees, and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Anne Otsuka
Global Travel Category Manager
Qualcomm Inc.

Deloitte.

Deloitte & Touche LLP
12830 El Camino Real
Suite 600
San Diego, CA 92130
USA

Tel: +1 619 232 6500
Fax: +1 619 237 6802
www.deloitte.com

June 13, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Deloitte enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

This direct flight would provide a much needed flight option between our two Washington DC Deloitte offices and San Diego for our 5000+ professionals in DC and 1000+ professionals in San Diego. Deloitte provides professional services to a number of Defense sector clients and Government and Public sector clients.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Juli Moran

San Diego Office Marketplace Leader
Managing Director | LCSP/Life Sciences, Deloitte Consulting, LLP

June 3, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Boston Consulting Group – San Diego enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Jason Jager

Managing Director and Senior Partner

**Founding Partner of BCG San Diego
Boston Consulting Group**



May 31, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Clark Construction Group - CA, LP enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

As a local builder with national reach, our offices span across the country from San Diego to Washington, DC. With our deep roots in the DMV our corporate leadership teams frequently traverse the country to support our people and projects. A nonstop flight would seamlessly bridge the geographical gap between our operations on the West Coast and our vital presence in the nation's capital. This enhanced connectivity not only boosts our operational efficiency, but also reinforces our commitment to delivering excellence.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN.



Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink, appearing to read "Carlos Gonzalez".

Carlos Gonzalez, Division President
Clark Construction Group - CA, LP



June 3rd, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Cox Communications enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market -- driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

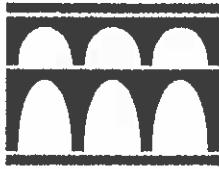
Cox Communications serves over 580,000 business and residential customers in San Diego County and with more federal focus on the funding of Broadband infrastructure and adoption efforts. It is critical to our business that we have access to the federal lawmakers and agencies that are crafting and executing policies that directly impact us in the San Diego region.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and will provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Ingo Hentschel
San Diego Market Vice President
Cox Communications



CULTURA
ENHANCING PLACE

June 3, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Cultura enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Cultura has long time employees with families in the greater DC area and also supports the federal government as a client.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Anne Benge
CEO

May 30, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

TaylorMade Golf enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Laura Garrett
SVP, Global Human Resources
TaylorMade Golf Company



May 29, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

As the President and CEO of Evans Hotels, I am writing to express our strong support for Alaska Airlines' application to initiate nonstop service between San Diego International Airport (SAN) and Washington, DC's Ronald Reagan National Airport (DCA).

The critical importance of connecting San Diego's economy to other significant markets cannot be overstated. Adding a direct flight between SAN and DCA is vital for several reasons:

1. **Economic Growth:** San Diego is home to thriving sectors such as biotech, defense, and academia. Direct access to the nation's capital will cultivate new business opportunities, attract investment, and facilitate closer collaboration with federal agencies and policymakers.
2. **Tourism:** As a top destination known for its beautiful beaches, cultural attractions, and pleasant climate, improved connectivity to Washington, DC, will bolster tourism. This influx benefits hotels, restaurants, and other local enterprises, providing employment opportunities, and strengthening the overall economy.
3. **Conferences and Meetings:** Our hotels frequently host national and international conferences, including association and government meetings from the DC and surrounding areas. Ease and travel convenience are critical factors in site selection for event organizers and attendees. Adding a nonstop flight to DCA would make San Diego a more attractive choice for many organizations, bringing increased revenue and visibility to our hotels and region as well as additional employment opportunities.

Despite the critical economic and security linkages between our region's academic, innovation, and defense clusters and our nation's capital, San Diego remains the largest metropolitan area without nonstop service to DCA. This gap hampers our potential for growth and collaboration on a national level.

Evans Hotels is proud to support Alaska Airlines in this initiative. We believe that establishing nonstop service between SAN and DCA is essential to meeting the evolving needs of our community and maintaining our competitive edge.

Thank you for considering this request and we urge you to approve Alaska Airlines application. We look forward to the positive impact that this service will bring to our region.

Sincerely,

Robert H. Gleason, JD, CHAE
President and Chief Executive Officer
Evans Hotels

May 29, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590



Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Firestorm Labs Inc. enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

At Firestorm, being a drone manufacturer, we are constantly making trips from our HQ in San Diego to Washington DC. We have demos, meetings and engagements on the hill that we attend multiple times a month. If San Diego offered a direct flight it would greatly increase our productivity and ability to continue to use San Diego as our hub, but also allow us to continue to take valuable in person meetings in a timely and efficient manner.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Daniel Magy
CEO & Founder

May 29, 2024



The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Firestorm Labs Inc. enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

At Firestorm, being a drone manufacturer, we are constantly making trips from our HQ in San Diego to Washington DC. We have demos, meetings and engagements on the hill that we attend multiple times a month. If San Diego offered a direct flight it would greatly increase our productivity and ability to continue to use San Diego as our hub, but also allow us to continue to take valuable in person meetings in a timely and efficient manner.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely, *Sarah Mendenhall*

Sarah Mendenhall

Chief of Staff at Firestorm Labs Inc.



1000BENEDICTAVERA@GMAIL.COM

Conrad@AQUACYCL.COM

www.aquacycl.com

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Filed: 01/27/2025

Document #20996840

USCA Case #25-1002

Friday, June 07, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Aquacycl Inc. enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.



1400 North 8th Street, Suite 100
Encinitas, CA 92024
www.aquacycl.com

Sincerely,



Jill Litschewski, COO
Aquacycl Inc.
(760)519-9454
jlitschewski@aquacycl.com



GKN Aerospace – Chem-tronics Inc.
1150 West Bradley Ave.
El Cajon, CA 92020
USA
T (619) 448-2320
F (619) 258-5270

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Filed: 01/27/2025

Document #20996840

USCA Case #25-1002

June 6th 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

GKN Aerospace enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

As a Tier 1 aerospace and defense supplier along with contributor to FAA programs located in San Diego area, having a direct flight from San Diego to Washington, D.C. would be great convenience and time savings for travelers.

EXPECT > MORE



Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in blue ink that appears to read "Doug Ramey".

Doug Ramey
Global Sales & Business Development
GKN Aerospace

EXPECT > MORE



May 29, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Biocom California supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route will enhance the connectivity between the two strategic regions, and supports the growing demand for nonstop service for both business and leisure passengers.

San Diego's significant defense, life science, and technology sectors require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passengers between SAN and DCA experience connections that add more than 360,000 hours annually of time inefficiency.

Biocom California is the state's life science association, headquartered in San Diego. We represent over 1,800 members in California and beyond with 650 of them having a presence in San Diego. This direct connection would facilitate greater ease of access for those working in the industry from basic researcher connecting with government sources of funding to pursue life changing treatments and cures, to those traveling to San Diego to attend the BIO Conference in June – our industry's largest annual gathering.

Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today, about 6,500 guests are served daily on 60 average departures. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a gap in the national air service network, and will provide more streamlined, efficient service.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Panetta".

Joe Panetta
President & CEO
Biocom California

06/06/2024

The Honorable Pete Buttigieg

U.S. Department of Transportation

1200 New Jersey Ave, SE

Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

As the founder of Health Innovation Products, we would like to enthusiastically support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

Additionally, I am a native of Maryland and have family members who live in both Maryland and Virginia. This additional option will be an additional choice given to people who need to go back and forth between the two coasts.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Shirin A. Dorin, DDS

Shirin A. Dorin, LLC

Health Innovation Products, LLC

June 7, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Intesa Communications Group enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community and will fill a critical gap in the national air service network.

We appreciate your consideration of this application.

Sincerely,

Maddy Kilkenny
Partner, Intesa Communications Group



June 6, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Quantum Applied Science and Research (QUASAR) and Wearable Sensing enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security. At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

QUASAR's research and development efforts include collaborations with Children National's hospital, the Naval base at Patuxent River, the Army Research Labs at Aberdeen, as well as interactions with the National Institute of Health (NIH), and the Food and Drug Administration (FDA), which have all benefited from travel to the region. Furthermore, Wearable Sensing's sales team regularly travels to the Washington DC area to meet with customers at research universities and for scientific conferences.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and provide more efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Walid Soussou
QUASAR, CEO
Wearable Sensing, Founder and President



Epitope Diagnostics, Inc.

Epitope Diagnostics, Inc.
7110 Carroll Road
San Diego, CA 92121 USA
Tel: (858) 693 7877

June 07, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Epitope Diagnostics, Inc. enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Laura Mendez
Epitope Diagnostics, Inc.
7110 Carroll Road San Diego CA 92121
lmendez@epitopediagnostic.com

EPITOPE DIAGNOSTICS, INC. IS A US FDA REGISTERED AND STATE OF CALIFORNIA DEPARTMENT OF HEALTH SERVICES FOOD AND DRUG BRANCH LICENSED MEDICAL DEVICE MANUFACTURER



DEVICE MANUFACTURING LICENSE NO: 59121 ISO13485:2016 CERTIFIED



June 10, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Visaic, Inc., enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Kanaan Jemili
Visaic, Inc.

June 13, 2023



The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

ACE PARKING enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market - driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith B. Jones'.

Keith B. Jones

Executive Chairman

ACE PARKING
645 Ash Street San Diego, California 92101



June 13, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

On behalf of Illumina, Inc., I am writing to express our support for the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

Illumina is a leading developer and manufacturer of life science tools and integrated systems for large-scale analysis of genetic variation and function. Our systems are critical in the progress toward the realization of personalized medicine. With nearly 9,100 employees worldwide, and almost 4,100 in its San Diego headquarters, Illumina drives the development of better, faster applications of its technology.

San Diego and Washington, D.C. are hubs of significant activity for Illumina. With an office in Washington, D.C. and Baltimore, MD., adding an additional airline with direct access to Reagan National Airport, would be a considerable improvement over our current corporate travel options.

Current U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service with 225 daily passengers. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks. Should you have any questions or concerns, please contact at me nmagallanes@illumina.com.

Sincerely,

Nick Magallanes
Illumina, Inc.
Vice President and Head, Government Affairs & Public Policy for U.S., Canada, and Latin America

Page 197 of 271

Filed: 01/27/2025

Document #20996840

USCA Case #25-1002

HARLAND

BREWING CO

10115 Carroll Canyon Road, San Diego, CA 92131 | Phone: 858-800-4566
Info@harlandbeer.com | www.harlandbeer.com

June 18th, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Harland Brewing Co., LLC enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Harland Brewing Co. is a local craft brewery known for our innovative styles of quality beers. We are also an active member of the California Brewer's Association (CBA) and the San Diego Brewers Guild (SDBG), who advocate for breweries across California on a range of regulatory and legislative issues. The CBA and SDBG frequently send representatives to Washington, D.C. to engage with federal lawmakers and regulators to ensure that the interests of California's brewing industry are well-represented. Efficient travel to D.C. is essential for these advocacy efforts, and the absence of a direct flight between SAN and DCA hinders this critical work. A nonstop route would significantly enhance the ability of our representatives and those of the CBA and SDBG to effectively engage with policymakers and support beneficial policies for our industry.



HARLAND

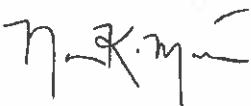
BREWING CO

10115 Carroll Canyon Road, San Diego, CA 92131 | Phone: 858-800-4566
Info@harlandbeer.com | www.harlandbeer.com

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Naomi Marron, Chief of Staff
Harland Brewing Co., LLC





10119 Carroll Canyon Rd, San Diego, CA 92131 | Phone: 858-401-7707
Info@scoutdist.com | www.scoutdist.com

June 18, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

Scout Distribution, LLC enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Scout Distribution, LLC, headquartered in San Diego, is a prominent distributor of alcoholic beverages. Our business relies on the effective advocacy of our interests in Washington, D.C., where federal regulatory agencies, trade associations, and policymakers are located. Officials and representatives who advocate on our behalf travel regularly to D.C. to ensure our voice and position are heard and defended in legislative and regulatory discussions. The absence of a nonstop flight between SAN and DCA creates inefficiencies that hinder these essential activities. Establishing a direct route would significantly enhance the ability of our representatives to engage with government officials and advocate for policies beneficial to our industry and the broader business community.





10119 Carroll Canyon Rd, San Diego, CA 92131 | Phone: 858-401-7707
info@scoutdist.com | www.scoutdist.com

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Jeff Hansson, CEO
Scout Distribution, LLC



May 28, 2024

PO Box 3679

Rancho Santa Fe, CA 92067-3679

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington D.C. 20590

Re: Alaska Airlines" application for SAN-DCA , Docket No. DOT-OS-2024

Dear Secretary Buttigieg:

REP Publishing, Inc., a San Diego-based multi-media company, enthusiastically supports the application of Alaska Airline to initiate nonstop service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA) or Reagan National). This new route is not only vital for enhancing the connectivity between two strategic regions , but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington D.C. are hubs of significant defense, economic and social activity. San Diego's sector in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market -driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily in each direction, not only does U.S Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

As a frequent Alaska Airlines flier, and specially to Washington for both business and family reasons it is an inordinate inconvenience to be forced to fly through LAX or SEA and then transfer to SAN . Alaska Airlines is my preferred choice. Its reputation for exceptional service, reliability and customer satisfaction is well earned.

I appreciate your consideration of this application . I hope Alaska Airlines will receive a favorable response from you and DOT in the coming weeks.

Cordially

Robert E. Page
Chief Executive Officer
REP Publishing, Inc.



June 10, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Secretary Buttigieg:

Subject: Alaska Airlines' application for nonstop air service between SAN-DCA

The San Diego Association of Governments (SANDAG) supports Alaska Airlines' application to initiate nonstop air service between San Diego International Airport (SAN or San Diego) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route will enhance connectivity between the two strategic regions, supporting the growing demand for nonstop service for business and leisure.

San Diego and Washington, DC, are hubs of significant defense, biotech, economic, technology, and social activity that require efficient access to the core of the national capital region. San Diego is the second largest government-related travel market, driven by demand for key institutions closest to DCA, including the Pentagon and Department of Homeland Security.

The US Department of Transportation's (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National yet is the largest domestic network without nonstop service. Adding nonstop daily destinations from San Diego will increase regional connectivity, fill a critical gap in the national air service network, and provide a more streamlined, efficient service to passengers.

SANDAG appreciates your consideration of this application for nonstop air service between San Diego International Airport and Reagan National to keep up with the region's growth and demand.

Sincerely,

Ray Major
Deputy Chief CEO



The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

May 30, 2024

Dear Secretary Buttigieg,

San Diego County Water Authority enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

San Diego County Water Authority sustains a \$268 billion regional economy and the quality of life for 3.3 million residents through a multi-decade water supply diversification plan, major infrastructure investments and forward-thinking policies that promote fiscal and environmental responsibility. It is imperative that the San Diego County Water Authority continues to engage with leaders in DC on a regular basis.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and provide a more streamlined, efficient service that will benefit the greatest number of passengers.

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Filed: 01/27/2025

Document #2096840

USCA Case #25-1002

The Honorable Pete Buttigieg

May 30, 2024

Page 2

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Denham".

Dan Denham

General Manager



Brittany Applestein Syz
Director, Regional Public Affairs
8330 Century Park Ct. CP31A
San Diego, CA 92123

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: SAN-DCA

Dear Secretary Buttigieg:

San Diego Gas & Electric enthusiastically supports the application to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

SDG&E is a regulated public utility that provides energy service to 3.7 million people through 1.5 million electric meters and 900,000 natural gas meters in San Diego and southern Orange counties. Our service area spans 4,100 square miles. Not only would this route be useful for business purposes, but also for our 4,500 employees and our customers to more seamlessly fly to Washington D.C.

Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the

greatest number of passengers. We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Brittany Applestein Syz

Brittany Applestein Syz
Director, Regional Public Affairs
San Diego Gas & Electric

July 2, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. DOT-OST-2024-

Dear Secretary Buttigieg:

On behalf of the 37,000 students and 7,700 faculty and staff at San Diego State University, I write in support of Alaska Airlines' application for nonstop service between San Diego International Airport (SAN) and Washington, DC Reagan National Airport (DCA). This route is essential for enhancing connectivity and meeting the growing demand for nonstop travel for business and leisure.

San Diego and Washington, DC are hubs of significant defense, academic, economic and social activity. San Diego's sectors in defense, biotech, higher-education, and communications technology require efficient access to the core of the national capital region. San Diego is the second largest GSA travel market – driven by demand to key institutions closest to the Reagan National Airport including the Pentagon and Department of Homeland Security.

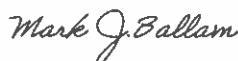
At 225 passengers daily each direction, not only does DOT data demonstrate that San Diego is the largest origin-destination market without service to Washington Reagan National Airport, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The average annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

San Diego State University is a distinguished public research institution, proudly serving over 37,000 students with more than 200 degree programs. Our diverse student body hails from over 100 countries, and our annual research funding surpasses \$192 million. We maintain strong ties to Washington, DC, a vital hub for our academic and research endeavors. As a result, many of our faculty, students, and staff frequently travel to the DC area to engage in pivotal academic programs and research opportunities, further enhancing our university's impact and connections on a national scale.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. The introduction of this nonstop flight will not only fill a critical gap in the national air service network, but also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We look forward to your favorable response to this request in the coming weeks.

Sincerely,



Mark J. Ballam
Managing Director
mballam@sdsu.edu | O: 619-594-3947 | M: 619-767-8068

UNIVERSITY OF CALIFORNIA SAN DIEGO

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO



SANTA BARBARA • SANTA CRUZ

OFFICE OF THE CHANCELLOR

9500 Gilman Drive # 0005
La Jolla, California 92093-0005
Tel: (858) 534-3135
Fax: (858) 534-6523
chancellor@ucsd.edu
chancellor.ucsd.edu

June 3, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Secretary Buttigieg,

The University of California, San Diego (UC San Diego) enthusiastically supports Alaska Airlines' application to initiate nonstop air service between San Diego International Airport (SAN) and Washington National Airport (DCA). This new route is vital for enhancing the connectivity between two nationally strategic regions, and would streamline access to the unique industries that shape our region's contributions to the U.S. economy.

San Diego and Washington, D.C. are hubs of defense, economic, political, and social activity, with a reciprocal need for direct access to each others' markets. For San Diego, the region's leadership in defense, biotech, and communications technology require efficient access to the core of the national capital region. At UC San Diego in particular, our faculty and researchers are working to solve the most challenging questions in these fields, often with equipment and projects funded by the federal government. Collaborating closely with DC-based federal partners is an essential component to simplifying this work, and direct access between SAN and DCA will support this effort.

UC San Diego serves as a regional hub of learning and public service, with our experts participating in research and education in hundreds of interdisciplinary fields of national interest. Our researchers earn more than \$1.76 billion in federal funding for their work annually, making our campus one of the federal government's largest academic research partners, and a critical contributor to the innovation economy San Diego's international reputation is founded on. Whether for policymakers traveling to campus to learn about innovative new technologies that are changing the world, for principal investigators meeting with program managers at a federal science agency to discuss their research, or for expert witnesses speaking to congressional committees or agency working groups, direct access between San Diego and Washington, D.C. is necessary for UC San Diego to reach its full potential, and for our federal partners to fully benefit from all our campus has to offer.

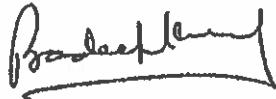
At 225 passengers daily each direction, not only does the U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Washington National Airport, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency and climate impact.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a

critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Pradeep K. Khosla
Chancellor
Joan and Irwin Jacobs Chancellor's Endowed Chair

UNIVERSITY OF CALIFORNIA SAN DIEGO

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO



SANTA BARBARA • SANTA CRUZ

ALBERT ("AL") P. PISANO, DHAN
IRWIN AND JOAN JACOBS SCHOOL OF ENGINEERING
WALTER J. ZABLE PROFESSOR OF ENGINEERING
7313 JACOBS HALL

9500 GILMAN DRIVE
LA JOLLA CALIFORNIA 92093-0403
TEL: (858) 534-6237 FAX: (858) 822-3904
EMAIL: DeanPisano@ucsd.edu

31 May 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

RE: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg

Jacobs School of Engineering enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

The Jacobs School of Engineering is the largest engineering school in California with extensive international research relationships. Travel to Washington DC is frequent and essential to our mission.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community,

Albert P. Pisano, Dean
Irwin and Joan Jacobs School of Engineering

will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Albert ("Al") P. Pisano
Member, US National Academy of Engineering
Member, US National Academy of Inventors
Walter J. Zable Distinguished Professor & Dean
Irwin and Joan Jacobs School of Engineering
Special Adviser to the Chancellor
University of California San Diego



OFFICE OF THE PRESIDENT

May 31, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines application for SAN-DCA

Dear Secretary Buttigieg:

MiraCosta College enthusiastically supports Alaska Airlines' application to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is vital for enhancing connectivity between these two strategic regions and supports the growing demand for nonstop service for business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's defense, biotech, and communications technology sectors require efficient access to the core of the national capital region. San Diego is the second-largest government-related travel market, driven by demand for key institutions closest to DCA, including the Pentagon and the Department of Homeland Security.

At 225 passengers daily in each direction, U.S. Department of Transportation (DOT) data demonstrates that San Diego is the largest origin-destination market without service to Reagan National. The SAN-DCA market is the largest domestic network without nonstop service. The annual 180,000-passenger population between SAN and DCA endures connections that add more than 360,000 hours annually of time inefficiency.

Direct access to Washington, D.C., is crucial for MiraCosta College and the broader community college network. This access facilitates our participation in national advocacy visits, policy discussions, and community college activities. It allows us to engage directly with policymakers, attend important conferences, and collaborate with other educational institutions, which are vital for advancing the mission of community colleges nationwide.

MIRACOSTA COMMUNITY COLLEGE DISTRICT

COMMUNITY LEARNING CENTER • OCEANSIDE CAMPUS • SAN ELIO CAMPUS
TECHNOLOGY CAREER INSTITUTE & NORTH SAN DIEGO SMALL BUSINESS DEVELOPMENT CENTER

1 BARNARD DRIVE, OCEANSIDE, CA 92056 • P 760.795.6610 • F 760.795.6609 • MIRACOSTA.EDU • SCOOKE@MIRACOSTA.EDU

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction makes it the ideal carrier to bridge these two critical markets. Alaska Airlines began serving SAN in 1985 and has grown by more than 75% in the last ten years. Today, that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop DCA to Alaska Airlines' daily destinations from SAN will increase connectivity for our larger community, fill a critical gap in the national air service network, and provide more streamlined, efficient service benefiting the most significant number of passengers.

We appreciate your consideration of this application and hope to hear your favorable response to this request in the coming weeks.

Sincerely,



Sunita V. Cooke, Ph.D.
Superintendent/President



Office of the Chief Community Engagement Officer California State University San Marcos 333 S. Twin Oaks Valley Road San Marcos, CA 92096
Tel: 760.750.8700 Fax: 760.750.3537 pprado@csusm.edu www.csusm.edu/ce

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Filed: 01/27/2025

Document #20996840

USCA Case #25-1002

July 2, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

California State University San Marcos (CSUSM) enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand for key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily in each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA has endured connections that add more than 360,000 hours annually of time inefficiency.

CSUSM maintains active relationships in the DC area that support student success, faculty research, community engagement and government affairs. All these areas are critical to our mission as a regional anchor institution of higher education. Furthermore, as responsible fiscal stewards, we are diligent in our efforts to travel economically. A direct, nonstop flight between SAN and DCA will support these efforts.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction makes it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, fill a critical gap in the national air service network, and provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear your favorable response to this request in the coming weeks.

Sincerely,



Patricia L. Prado-Olmos, Ph.D.
Chief Community Engagement Officer
Community Relations and University Engagement
Office of the President
CSU San Marcos



The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

May 30th, 2024

Dear Secretary Buttigieg:

Point Loma Nazarene University (PLNU) enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

First, San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Second, being a member of the Council for Christian Colleges and Universities (CCCU) located in Washington, D.C., PLNU would greatly benefit from a daily connection to the Ronald Reagan Washington National Airport to strengthen our involvement in a network of like-minded, mission-driven, academically excellent Christian colleges and universities around the world.

Finally, Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthieu Rouffet".

Matthieu Rouffet, Ph.D.
Professor and Chair of Chemistry
Point Loma Nazarene University
3900 Lomaland Drive, San Diego, CA 92106

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June 2, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

The San Diego Military Advisory Council (SDMAC) enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

SDMAC is a 501(c)(6) nonprofit organization that supports our local military community by advancing the partnership and communication between the military, elected officials, and the business community while serving as a strong advocate for those who serve and their families. SDMAC advocates, informs and connects leadership across sectors to advance the role of defense as a significant part of the regional economy and beyond. Many companies and fellow nonprofits among our membership regularly conduct business nationwide, in particular in the Washington, D.C. area where they may have headquarters, affiliates, and partners or where they frequently interact with federal departments and agencies.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, and the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA endure connections that add over 360,000 hours annually of lost efficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Paul D. Pearigen
Rear Admiral, U.S. Navy (Retired)
Interim President & CEO
Email: ceo@sdmac.org
Office: 619-299-3763



Veterans in Business Network
3621 Hawthorn Street
San Diego, CA 92104

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

The Veterans In Business (VIB) Network enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Last year, I was appointed to the US SBA Advisory Council on Veteran Business Affairs, a position that has helped give another voice for Veteran business owners nationwide. With this new appointment, I find that I'm frequently having to travel to DC from San Diego to ensure that the issues and successes of the Veteran business community are communicated with impactful in-person meetings.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,



Rebecca Aguilera-Gardiner, CEO

June 4, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg,

We enthusiastically support the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon, Department of Veterans Affairs, and the Department of Homeland Security.

As you may know, the San Diego region is host to significant military installations including Marine Corps Recruit Depot, Naval Base San Diego, Marine Corps Air Station Miramar, Naval Base Point Loma, Marine Corps Base Camp Pendleton, Coast Guard Sector/Air Station San Diego, Naval Base Coronado, as well as national guard and reserve centers for every branch of military service.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Today, there are more than 6,500 guests served daily by Alaska Airlines to and from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity and provide a more streamlined, efficient service for our larger community including those who serve, their families as well as our veterans.

We appreciate your consideration of this application.

Sincerely,

Anthony L. Jackson
Major General, USMC (Ret)

Gregg A. Sturdevant
Major General, USMC (Ret)

Scott F. Smith
Major General, USAF (Ret)

Terry B. Kraft
Rear Admiral, USN (Ret)

John P. Farnam
Colonel, USMC (Ret)

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June 3, 2024

The Honorable Pete Buttigieg
 U.S. Department of Transportation
 1200 New Jersey Ave, SE
 Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

San Diego Zoo Wildlife Alliance (SDZWA) enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

San Diego Zoo Wildlife Alliance (SDZWA) is supportive of this new non-stop route from both a business and tourism point of view. SDZWA has employees in both locales, a new non-stop SAN-DCA is helpful in providing flexibility in travel schedules to/from each location. Additionally, as a major tourism destination in San Diego, we remain committed to ease and flexibility of travel to San Diego. SDZWA welcomes more than 5 million guests each year, many of whom travel from other locations. Adding additional routes to San Diego will make it easier for guests to travel to San Diego and enhance the guest experience.

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and Executive Director
San Diego Zoo Safari Park

Nadine Lamberesi
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Chief Conservation and
Wildlife Officer

Wendy Bulger
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David Gillig
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Aida Rosa
Chief Human Resources Officer

David Miller
Chief Marketing Officer

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn Dixon".

Shawn Dixon
Chief Operating Officer



burnham center
for community
advancement

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Page 225 of 271

File# 127205

Document #209820

Case #25-1000

May 23, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

The Burnham Center for Community Advancement is a San Diego regional nonprofit dedicated to helping make our region a better place to live work and play for all.

The Burnham Center for Community Advancement supports strong consideration of nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is important to enhance the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, and the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

Adding a nonstop to DCA to San Diego International Airport's daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application.

Sincerely,

Tad Seth Parzen

President & CEO, Burnham Center for Community Advancement

The Burnham Center for Community Advancement is a 501(c)3 tax-exempt organization (84-4770687), and your donation is tax-deductible within the guidelines of the law. No goods or services were received in exchange for this donation. Please retain this letter as your documentation for tax purposes.

May 23, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA

Dear Secretary Buttigieg:

The Leukemia and Lymphoma Society Southern California – Hawaii Region enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C. are hubs of significant defense, economic and social activity. San Diego's sectors in defense, biotech and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government related travel market – driven by demand to key institutions closest to DCA including the Pentagon and Department of Homeland Security.

At 225 passengers daily each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA have endured connections that add more than 360,000 hours annually of time inefficiency.

The Leukemia & Lymphoma (LLS) stands upon three mission pillars – research, patient support, and advocacy. As you can imagine, many of our local San Diego advocates often fly to Washington, DC to represent our organization and advocate for policy changes. With more direct flights to Washington, DC LLS could afford to send more advocate to the Capital with the hopes of many bigger change for many of the cancer patients we support and even those who might not yet be affected. Alaska Airlines is a well-known, respected, and trusted airline within our demographic. Our volunteers would be ecstatic at the added SAN to DCA flight path.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction make it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and in the last 10 years has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

Abbey Gill

Campaign Development Manager – The Leukemia & Lymphoma Society
abbey.gill@lls.org

United Way of San Diego County

4699 Murphy Canyon Road
San Diego, CA 92123
Tel 858.492.2000
Fax 858.492.2059
uwsd.org



United Way
of San Diego County

May 30, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Alaska Airlines' application for SAN-DCA, Docket No. **DOT-OST-2024-**

Dear Secretary Buttigieg:

United Way of San Diego County enthusiastically supports the application of Alaska Airlines to initiate nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is not only vital for enhancing the connectivity between the two strategic regions, but also supports the growing demand for nonstop service for both business and leisure passengers.

San Diego and Washington, D.C., are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech, and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government-related travel market – driven by demand to key institutions closest to DCA, including the Pentagon and Department of Homeland Security.

At 225 passengers daily in each direction, not only does U.S. Department of Transportation (DOT) data demonstrate that San Diego is the largest origin-destination market without service to Reagan National, but the SAN-DCA market is the largest in the entire domestic network without nonstop service. The annual 180,000 passenger population between SAN and DCA has endured connections that add more than 360,000 hours annually of time inefficiency.

United Way of San Diego County supports nonstop air service between SAN and DCA because it would not only benefit our greater community but make our connection to United Way Worldwide headquarters in Alexandria, VA, more accessible. As a nonprofit leader in San Diego County for over 100 years, accessible, efficient travel to our nation's capital would also allow us to further our work with the United Way Worldwide National Advisory Council and advocate for policy change affecting education and economic mobility that would benefit our region.

Alaska Airlines' reputation for exceptional service, reliability, and customer satisfaction makes it the ideal carrier to bridge these two important markets. Alaska Airlines began serving SAN in 1985 and, in the last 10 years, has grown by more than 75%. Today that means about 6,500 guests served daily and 60 average daily departures from SAN. Adding a nonstop to DCA to Alaska Airlines' daily destinations from SAN will mean increased connectivity for our larger community, will fill a critical gap in the national air service network, and also provide a more streamlined, efficient service that will benefit the greatest number of passengers.

We appreciate your consideration of this application. We hope to hear of your favorable response to this request in the coming weeks.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy L. Sasaki".

Nancy L. Sasaki
President & CEO
United Way of San Diego County
858.636.4141
Nancy.sasaki@uwsd.org

June 4, 2024

The Honorable Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

Subject: Alaska Airlines' Application for SAN-DCA

Dear Secretary Buttigieg,

The Policy & Innovation Center (PIC) fully supports Alaska Airlines' application to establish nonstop air service between San Diego International Airport (SAN) and Ronald Reagan Washington National Airport (DCA or Reagan National). This new route is crucial for improving connectivity between these two important regions and meeting the increasing demand for nonstop air service for both business and leisure travelers.

San Diego and Washington, D.C. are hubs of significant defense, economic, and social activity. San Diego's sectors in defense, biotech, and communications technology require efficient access to the core of the national capital region. San Diego is the second largest government-related travel market, driven by demand for key institutions closest to DCA, including the Pentagon and the Department of Homeland Security.

With 225 passengers daily in each direction and with U.S. Department of Transportation (DOT) data showing that San Diego is the largest origin-destination market without service to Reagan National, the SAN-DCA market is the largest in the entire domestic network without nonstop service. This gap in the market has led to an annual 180,000 passenger population between SAN and DCA enduring connections that result in more than 360,000 hours annually of time inefficiency.

PIC is a think tank and social-impact incubator founded in partnership with the Washington, D.C.-based Brookings Institution, the County of San Diego, and the San Diego Foundation. PIC conducts research and policy analysis to identify creative solutions to the region's biggest problems, and we build cross-sector, multijurisdictional partnerships to advance those solutions. PIC is deeply interested in improving connectivity with Washington, D.C., as our work often involves collaboration with federal agencies and national organizations based in the capital. Better air service between SAN and DCA will enable more effective engagement with key stakeholders and allow us to better serve the San Diego region through our initiatives and partnerships. Enhanced connectivity between San Diego and D.C. is essential for fostering these relationships and ensuring the timely and effective execution of our initiatives.

Alaska Airlines' outstanding reputation for service, reliability, and customer satisfaction makes it the ideal carrier to bridge these two important markets. Having served SAN since 1985 and grown by over



75% in the last ten years, Alaska Airlines currently serves about 6,500 guests daily with 60 average daily departures from SAN. Introducing a nonstop DCA to Alaska Airlines daily destinations from SAN will lead to increased connectivity for our larger community, fill a critical gap in the national air service network, and provide more streamlined, efficient service for the benefit of a greater number of passengers.

Thank you for considering this application. We hope to receive your favorable response to this request in the coming weeks. If you need additional assistance, please contact me at ewier@sdrpic.org.

Sincerely,

A handwritten signature in black ink that reads "Emily Wier".

Emily Wier
VP, Chief Policy & Strategy Officer
Policy & Innovation Center

**COMMENTS OF ALASKA AIRLINES, INC.,
FOR SLOT EXEMPTIONS (JULY 17, 2024), DOT-OST-2024-0065-22194**

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, DC**

Establishment of Slot Exemption Proceeding)
At Ronald Reagan Washington National Airport) Docket DOT-OST-2024-0065
Pursuant to 49 U.S.C. § 41718)
)

**COMMENTS OF ALASKA AIRLINES, INC.
FOR SLOT EXEMPTIONS
Washington, DC (DCA)–San Diego, CA (SAN)**

Communications with respect to this document should be addressed to:

Kyle Levine
Senior Vice President,
Legal & General Counsel

Cameron Cloar-Zavaleta
Deputy General Counsel
& Managing Director,
Litigation & Regulatory Law

ALASKA AIRLINES, INC.

19300 International Boulevard
Seattle, Washington 98188

David Heffernan
Michael Deutsch
Amanda Geary Losacco
COZEN O'CONNOR
1200 19th Street, NW
Washington, DC 20036
(202) 912-4800
dheffernan@cozen.com
mdeutsch@cozen.com
alosacco@cozen.com

Counsel for
ALASKA AIRLINES, INC.

DATED: July 17, 2024

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, DC**

Establishment of Slot Exemption Proceeding)	
At Ronald Reagan Washington National Airport)	Docket DOT-OST-2024-0065
Pursuant to 49 U.S.C. § 41718)	
)	

**COMMENTS OF ALASKA AIRLINES, INC.
FOR SLOT EXEMPTIONS
Washington, DC (DCA)–San Diego, CA (SAN)**

Alaska Airlines, Inc. (“Alaska”), the nation’s premier West Coast-based airline, renowned for its low fares, high-quality service and operational excellence, submits these comments in support of its application for two slot exemptions to operate daily nonstop roundtrip service between Ronald Reagan Washington National Airport (“DCA”) and San Diego International Airport (“SAN”).¹ Alaska’s application amply satisfies Congress’s and DOT’s requirements for an allocation of slot exemptions, and will enable Alaska to introduce nonstop DCA service to the San Diego area—the largest market without such service.

I. Alaska’s DCA-SAN Service Will Generate Substantial Consumer Benefits and Enhance Competition

The need for nonstop service between DCA and SAN is compelling. San Diego is the eighth largest U.S. city, home to the nation’s largest military community, located in the fifth largest U.S. county, and its airport, SAN, accounts for the greatest number of passengers of any U.S. airport without nonstop DCA service.²

¹ Application of Alaska Airlines, Inc., July 8, 2024 (Docket DOT-OST-2024-0065) (“Alaska Application”).

² SAN, with a “Passengers Per Day Each Way” (“PPDEW”) measure of 225, is by far the U.S. airport with the greatest number of passengers without nonstop service to DCA. For context, the second-largest airport without nonstop service to DCA, San Antonio International Airport, has a PPDEW of 155. *See Alaska Application at 4.*

Comments of Alaska Airlines, Inc.

Page 2

Alaska's DCA-SAN nonstop service will enhance competition and provide myriad service benefits to consumers, including:

- Meaningfully increase nonstop capacity and service options between Washington, DC, and San Diego, a key focus city for Alaska,³ benefiting business and leisure travelers with fares that on average are lower than those of Alaska's competitors.⁴
- Enhance fare and service competition on a nonstop basis between Washington, DC, and San Diego, and in other markets in the western U.S. and Hawai'i, where passengers travelling to and from Washington, DC, will benefit from additional connecting service via SAN.⁵
- Provide San Diego's large community of government personnel (civilian and military)⁶ with convenient nonstop access to DCA⁷ and its nearby government and military facilities, including the Pentagon, numerous federal agencies, and many large military bases.⁸

Alaska continues to grow its network at SAN, and just last week announced new nonstop service, beginning in December 2024, from SAN to Reno, Nevada ("RNO") and Vail (Eagle County), Colorado ("EGE").⁹ Alaska will be the only carrier operating nonstop service on the

³ Alaska began serving SAN in 1985 and has continued to expand its presence ever since. Alaska employs approximately 800 team members and maintains a flight attendant base in SAN. Commencing December 2024, Alaska will serve 39 nonstop markets from SAN. Nonstop service to/from DCA will be an important addition to Alaska's network, establishing a key additional transcontinental route that will enable Alaska to further grow at SAN and serve a broad range of passenger demand. *See Alaska Application at 6-7.*

⁴ Average fares on the IAD-SAN route decreased by approximately 26% following Alaska's entry into the market. *Alaska Application at 5.* Alaska expects this downward trend to continue with the introduction of its DCA-SAN service.

⁵ *See Alaska Application at 2 n.6.*

⁶ San Diego is home to the largest concentration of active-duty military personnel in the United States.

⁷ Currently, local San Diego travelers must rely on connections to travel to DCA. In 2023, approximately 164,000 passengers traveled between SAN and DCA, accumulating approximately 328,000 hours of additional annual travel time in the aggregate due to having to make a connection. *See Alaska Application at 4.*

⁸ The General Services Administration estimates that over 28,000 government personnel will travel between DCA and SAN in Fiscal Year ("FY") 2024, increasing to nearly 32,000 in FY 2025. *See Alaska Application at 4.*

⁹ *See Maria Cid, Alaska Airlines expands winter travel options with 18 exciting new sun and ski routes, Alaska Airlines (July 10, 2024),* <https://news.alaskaair.com/alaska-airlines/alaska-airlines-expands-winter-travel-options-with-18-exciting-new-sun-and-ski-routes/>.

Comments of Alaska Airlines, Inc.

Page 3

SAN-EGE route. With these additions, Alaska will operate nonstop service to a total of 39 destinations from SAN, 19 of which will be served exclusively by Alaska on a nonstop basis.¹⁰

Alaska's proposal to introduce daily nonstop service between DCA and SAN has strong support from the San Diego County Regional Airport Authority, a wide range of San Diego area and State of California government leaders, as well as San Diego area business and civic organizations. These parties recognize the substantial public benefits that Alaska's service will generate for the San Diego area and other western U.S. communities, as well as for passengers, including business, government, military, and leisure travelers.¹¹

II. Response to Other Carrier Applications

A. **Spirit and Frontier are Ineligible Carriers**

Spirit Airlines, Inc. ("Spirit") and Frontier Airlines, Inc. ("Frontier") filed applications to serve San Jose¹² and San Juan, respectively, positing that they are eligible to apply for slot exemptions as "limited incumbent carriers."¹³ However, DOT, in its Notice served June 24, 2024 in the above-captioned docket establishing this proceeding, determined the carriers eligible to apply for slot exemptions either as a non-limited incumbent or limited incumbent carrier. DOT reached this determination after conferring with the FAA Slot Administration Office.¹⁴ In

¹⁰ See Exhibit AS-R-1.

¹¹ See Alaska Application, Exhibit AS-19.

¹² Today (as was the case on the date that Section 502 of the FAA Reauthorization Act of 2024 was enacted), Spirit operates no service at DCA, having abandoned the airport in 2012. Setting aside the merits of Spirit's application, it is curious that an airline professing to be "ultra-low cost" like Spirit, would incur the expense and complexity to reestablish a DCA presence just to operate a single-daily service to San Jose. It is an even more perplexing business decision given the fact that SJC is only 34 miles from San Francisco International Airport, which already has double-daily (and, if United's application is approved, triple-daily) nonstop DCA service.

¹³ Application of Spirit Airlines, Inc., July 8, 2024; Application of Frontier Airlines, Inc., July 8, 2024 (Docket DOT-OST-2024-0065).

¹⁴ See Establishment of Slot Exemption Proceeding at Ronald Reagan Washington National Airport Pursuant to 49 U.S.C. § 41718, June 24, 2024 (Docket DOT-OST-2024-0065) ("DOT Notice").

Comments of Alaska Airlines, Inc.

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identifying the list of carriers eligible to apply, DOT specifically noted that “the list only includes those carriers marketing air transportation at DCA on the date of enactment of [the FAA Reauthorization Act of 2024].”¹⁵

DOT thus determined that Alaska, but not Spirit or Frontier, is eligible to apply as a limited incumbent carrier.¹⁶ Alaska, therefore, will not address the applications of Spirit or Frontier¹⁷ on their respective merits, on the reasonable expectation that DOT, in its final order, will re-confirm those carriers’ ineligibility and appropriately decline to entertain their applications.¹⁸

B. Correction of False Statements in Delta’s Application

Delta Air Lines, Inc. (“Delta”) applied for an allocation of slot exemptions to operate nonstop service between DCA and Seattle (“SEA”) and, in doing so, made numerous false and misleading statements about Alaska’s existing service on that route.¹⁹ Alaska takes no position as to which non-limited incumbent carriers should receive an allocation of slot exemptions in this case, but is compelled to correct the record. While the Delta Application is replete with

¹⁵ DOT Notice at 2 n.3.

¹⁶ DOT Notice at 2. Neither Spirit nor Frontier filed a petition for reconsideration or motion to amend the DOT Notice. Spirit filed a letter expressing its intent to apply for the slot exemption pair available for allocation to an eligible limited incumbent carrier despite DOT’s prior determination of Spirit’s ineligibility. Letter of Counsel for Spirit Airlines, Inc., June 26, 2024 (Docket DOT-OST-2024-0065). Frontier sent an email to DOT staff on an *ex parte* basis two days after issuance of the DOT Notice seeking “confirmation” that Frontier qualifies as a limited incumbent carrier. Email from Brian Foont, Counsel for Frontier Airlines, Inc., to Albert Muldoon, DOT, June 26, 2024. DOT declined to respond to Frontier’s email, citing DOT’s prohibition against *ex parte* communications. Perhaps not surprisingly, Spirit and Frontier each take the position that the other is ineligible.

¹⁷ The DOT Notice sets forth “minimum” requirements for submission of a complete application, including that an applicant identify the aircraft type it would use to provide its proposed service, “a schedule showing proposed times” and “an approximate start-up date.” DOT Notice at 3. Frontier’s perfunctory application contains none of this information. Thus, even if Frontier were eligible to apply (DOT has determined that it is not), Frontier would be subject to disqualification for its failure to provide the minimum information DOT requires.

¹⁸ If DOT were to decide otherwise, Alaska, as a matter of due process, would be entitled to an opportunity to address both the issue of carrier eligibility and the applications of Spirit and Frontier on the merits.

¹⁹ Application of Delta Air Lines, Inc., July 8, 2024 (Docket DOT-OST-2024-0065) (“Delta Application”).

Comments of Alaska Airlines, Inc.

Page 5

disingenuous claims and petty pejoratives, Alaska will limit its comments to the below two claims.

Claim 1: Delta falsely claims that Alaska's DCA-SEA service has "some of the highest ticket prices in the country"²⁰ and that its DCA-SEA service would "exert[] downward fare pressure" on Alaska:

- Alaska's DCA-SEA fares are consistent with fare levels for other nonstop services between DCA and cities on the West Coast. By contrast, the DCA-beyond perimeter city nonstop route with the "highest ticket prices in the country" is DCA-Salt Lake City ("SLC"), where Delta operates the only nonstop service.²¹
- Two of the top three highest DCA-beyond perimeter nonstop fares are on Delta's DCA-SLC and DCA-LAX routes.²² Perhaps Delta is waiting for a later date to "exert downward fare pressure" for LA-based travelers.
- Of the three carriers that operate nonstop DCA-LAX service, Delta's fares are the highest, whereas Alaska's are the lowest.²³
- It is Delta, not Alaska, that has "some of the highest ticket prices *in the country*." In fact, Delta has the highest domestic fares of *any* U.S. airline nationwide.²⁴

In sum, Delta's DCA-beyond perimeter nonstop route fares are the highest of any carrier, regardless of whether Delta is the only carrier or faces competition on a given nonstop route. The

²⁰ See David Shepardson, *Delta seeks new Seattle flight as airlines jockey over DC slots*, Reuters (June 6, 2024), <https://www.reuters.com/business/aerospace-defense/delta-seeks-new-seattle-flight-airlines-jockey-over-dc-slots-2024-06-06/>. Delta did not repeat this false claim in its application but rather stated that it would "exert[] downward fare pressure" on Alaska's DCA-SEA service. Delta Application at 3, 6. As the data Alaska cites herein reflects, Delta's pricing strategy is to use its size and scale to maximize yields rather than serve as a lower-fare option. This contrasts with Alaska's approach, which, as a much smaller carrier dedicated to maintaining customer loyalty, is to offer lower fares and high-quality service.

²¹ See Exhibit AS-R-2.

²² Delta's DCA-SLC fares are the highest beyond-perimeter DCA fares in the nation. See Exhibit AS-R-3.

²³ See Exhibit AS-R-4.

²⁴ See Exhibit AS-R-5 (as measured by stage-length adjusted yields).

Comments of Alaska Airlines, Inc.

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particular route and availability of nonstop competition may vary, but Delta's high fares remain ever-present.²⁵

Claim 2: Delta falsely claims that Alaska's existing DCA-SEA service is "inadequate" and "lackluster".²⁶:

- Alaska is proud of its popular and successful nonstop DCA-SEA service, which has sufficient capacity to accommodate both nonstop and connecting passengers. In 2023, an average of 271²⁷ passengers traveled between DCA and SEA each day relative to an average availability of 318 daily seats, thus demonstrating that Alaska's capacity on the DCA-SEA route is more than "adequate" to meet demand.²⁸ In stark contrast, in 2023, an average of 259 passengers per day traveled between DCA and SLC, yet capacity was lacking as there were only 194 nonstop seats offered on Delta's nonstop route.
- Moreover, 29% of travelers on Alaska's DCA-SEA nonstop flights are connecting passengers, thus further undercutting Delta's erroneous and irresponsible assertion that DCA-SEA flights have "some of the highest ticket prices in the country." If such flights were among the highest priced in the country (they are not), surely connecting passengers would connect on other routes.²⁹
- Alaska has earned countless awards for its outstanding service, including 2024 Best U.S. Airline & Frequent Flier Program (Wallet Hub), Top Airline Reputation (2024 Axios Harris Poll), and 2023 Worldwide Airline of the Year (Centre for Aviation).³⁰ Alaska's Mileage Plan is the industry's leading loyalty program (ranked as the best airline rewards program for *nine*

²⁵ See Veronika Bondarenko, *Delta CEO sounds alarm about a growing problem*, TheStreet (July 12, 2024), <https://www.thestreet.com/lifestyle/travel/why-is-delta-stock-so-low> (noting "Delta was 'fairly well insulated' from [lower fare discounting] due to the higher number of business and other premium tickets it sells as [a] luxury-minded airline") (quoting Delta CEO Ed Bastian).

²⁶ Delta Application at 1, 2, 5, 7.

²⁷ This number includes passengers who flew on Alaska's nonstop DCA-SEA service as well as passengers flying on another carrier's connecting service.

²⁸ See Exhibit AS-R-6.

²⁹ Alaska's DCA-SEA service is popular with both nonstop and connecting passengers. Specifically, Alaska's nonstop flights between DCA and SEA serve 73% of origin & destination passengers traveling between the two airports, with the remaining 27% making connections. By contrast, more than half (53%) of DCA-SLC passengers make a connection to avoid the high fares on Delta's nonstop DCA-SLC service—nearly double the number of connecting passengers as those that travel on Alaska's DCA-SEA route.

³⁰ See Alaska Application, Exhibit AS-17.

Comments of Alaska Airlines, Inc.

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consecutive years by U.S. News & World Report and five consecutive years by NerdWallet).³¹

- Alaska's combination of lower fares and customer service excellence across multiple cabin and fare product options, and its ability to offer guests travel options to more than 1,000 destinations worldwide on Alaska's 30 **oneworld** Alliance and other global partner airlines, enables Alaska to compete effectively against Delta and other much larger carriers. Alaska's track record of network growth (at a faster rate than Delta and the other "Big Four" carriers)³² is testament to Alaska's competitive tenacity.

These facts, though inconvenient for Delta, demonstrate that Alaska's service, whether on the DCA-SEA route or elsewhere, is consistently embraced by passengers for its quality *and* value, which Alaska's crew members consistently deliver with care and thoughtfulness year after year, to industry-leading accolades.

III. Conclusion

Alaska requests that the Department grant it two slot exemptions at Ronald Reagan Washington National Airport to enable Alaska to operate once-daily nonstop roundtrip service to/from San Diego International Airport.

[Signature Page Follows]

³¹ See Alaska Application at 8.

³² See Alaska Application, Exhibit AS-14.

Respectfully submitted,



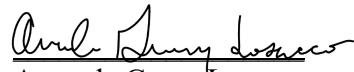
David Heffernan
Michael Deutsch
Amanda Geary Losacco
COZEN O'CONNOR
1200 19th Street, NW
Washington, DC 20036
dheffernan@cozen.com
mdeutsch@cozen.com
alosacco@cozen.com

Counsel for
ALASKA AIRLINES, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing Comments of Alaska Airlines, Inc. by electronic mail upon the following:

Air Canada:	anita.mosner@hklaw.com
American Airlines:	molly.wilkinson@aa.com
Breeze Aviation Group, Inc.:	brent.alex@aa.com
Delta Air Lines:	perkmann@cooley.com
Frontier Airlines:	chris.walker@delta.com
JetBlue Airways:	steven.seiden@delta.com
Southwest Airlines:	howard.diamond@flyfrontier.com
Spirit Airlines:	foont@foontlaw.com
United Airlines:	robert.land@jetblue.com
DOT/FAA:	reese.davidson@jetblue.com
	leslie.abbott@wnco.com
	jyoung@yklaw.com
	dkirstein@yklaw.com
	dcrowell@yklaw.com
	aarshad@crowell.com
	steve.morrissey@united.com
	dan.weiss@united.com
	todd.homan@dot.gov
	peter.irvine@dot.gov
	kevin.bryan@dot.gov
	fahad.ahmad@dot.gov
	jason.horner@dot.gov
	albert.muldoon@dot.gov
	brett.kruger@dot.gov
	robert.finamore@dot.gov
	lawrence.fields@faa.gov


Amanda Geary Losacco

DATED: July 17, 2024



Alaska Will Now Serve 39 Airports⁺ Nonstop From San Diego

ATL	HNL	OGG	SJD	FCA*
AUS	IAD	PAE	SLC	FLL*
BOI	JFK	PDX	SMF	HDN*
BOS	KOA	RDM	STS	JAC*
EUG	LAS	SBP	TPA	MSO*
EWR	LIH	SEA	ANC*	EGE**
FAT	MCO	SFO	BZN*	RNO**
GEG	MRY	SJC	PVR*	

The following airports are served only by Alaska from SAN on a nonstop basis: ANC, BZN, EGE, EUG, FAT, FCA, GEG, HDN, JAC, KOA, LIH, MCO, MRY, MSO, PAE, PVR, RDM, SBP, and STS.

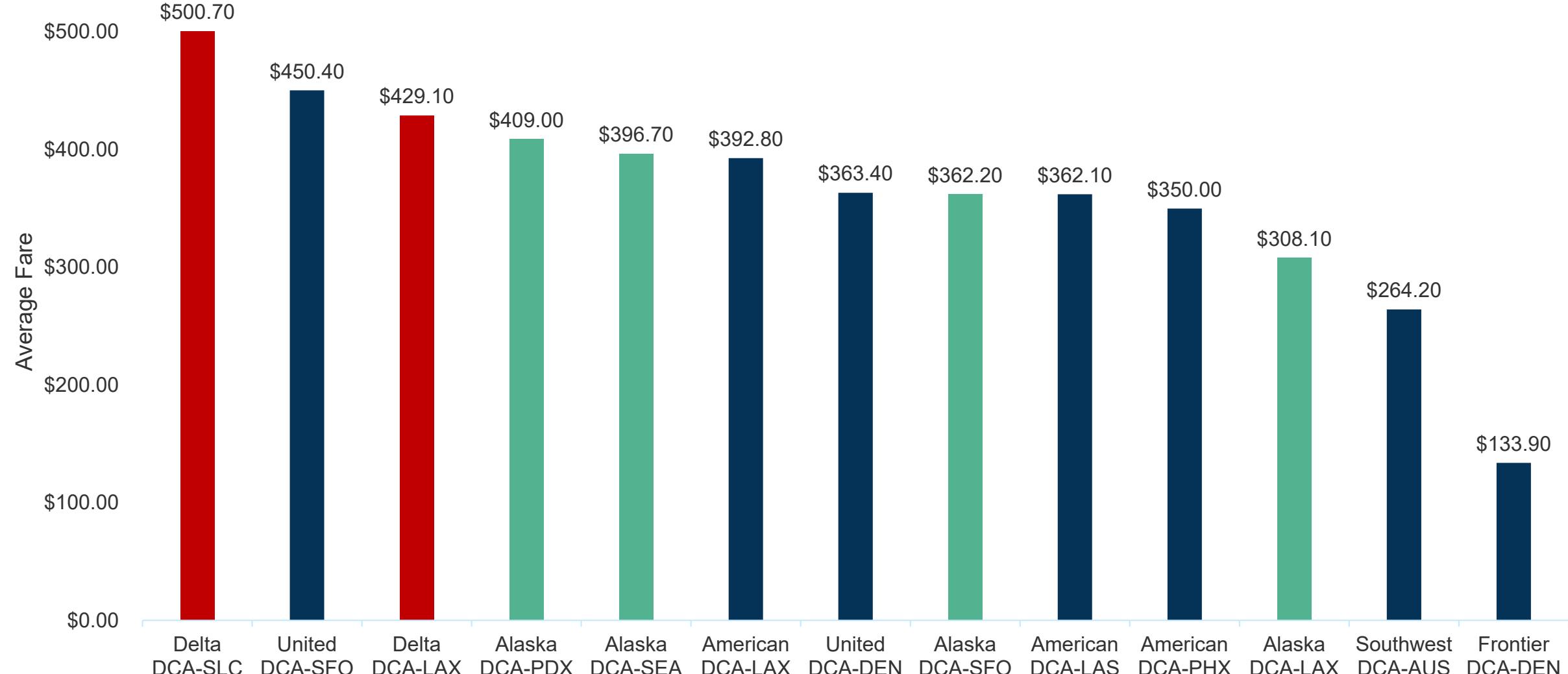
⁺ Alaska has discontinued nonstop SAN-CUN service.

*Seasonal service.

**New nonstop seasonal service will begin in December 2024 -



Delta's DCA-SLC Route is 26% More Expensive than Alaska's DCA-SEA Route and is by far the Most Expensive DCA-Beyond Perimeter Route



Alaska
AIRLINES

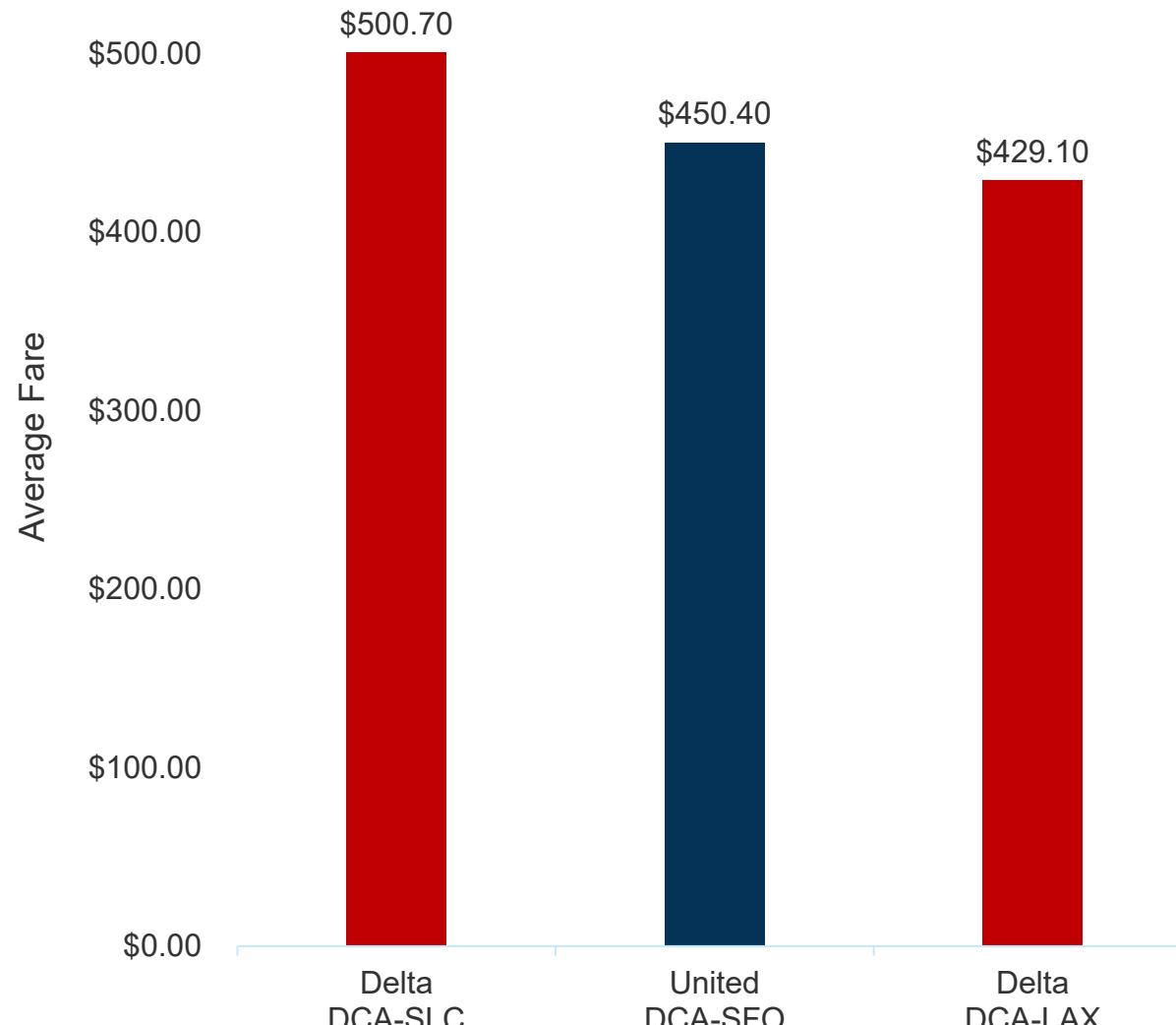
Source: U.S. DOT DB1B Database, 2023. Average nonstop one-way O&D fares including taxes and fees; including fares greater than \$25.

- SA203 -

Exhibit AS-R-2



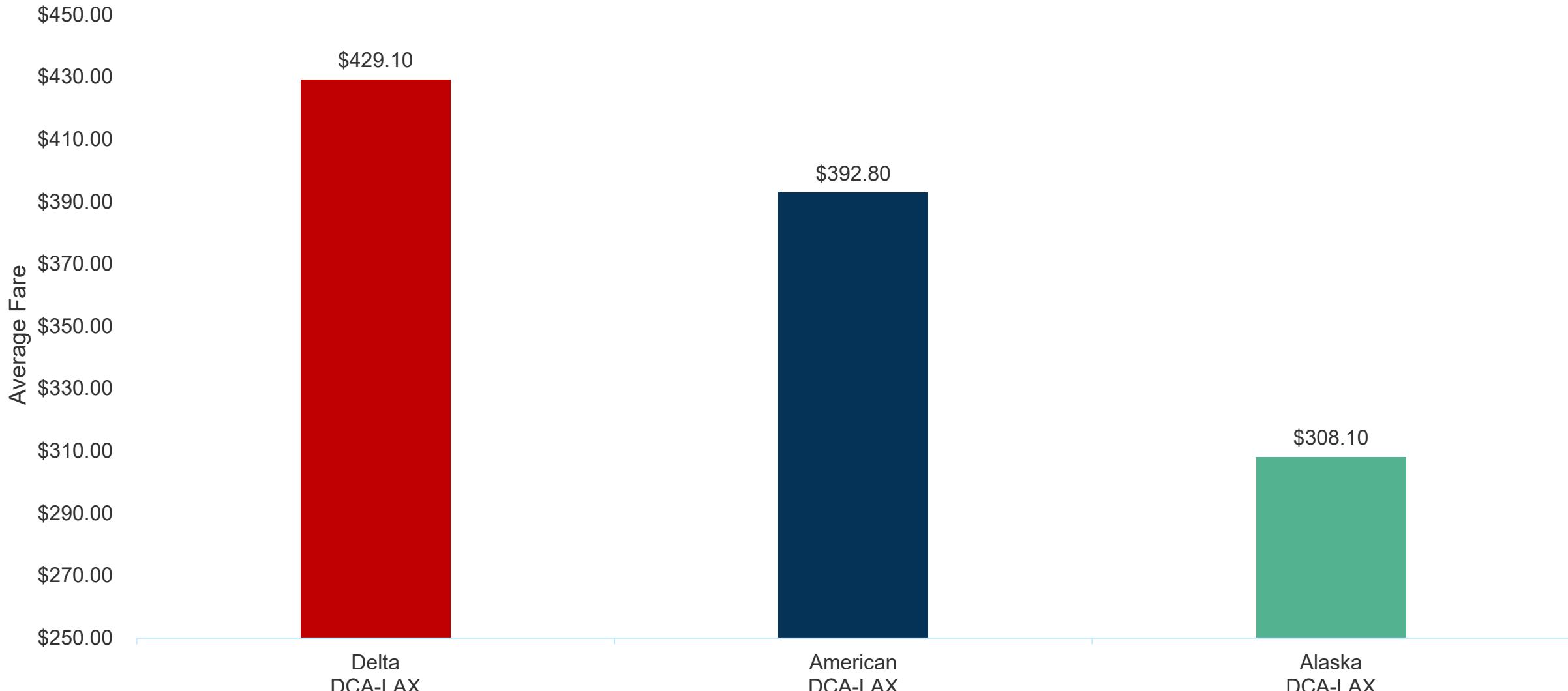
Two of the top-three highest DCA-beyond perimeter fares are on Delta routes



Source: U.S. DOT DB1B Database, 2023. Average nonstop one-way O&D fares including taxes and fees; including fares greater than \$25.



Delta's DCA-LAX fares are nearly 40% higher than Alaska's, and nearly 10% higher than the next-highest competitor



Source: U.S. DOT DB1B Database, 2023. Average nonstop one-way O&D fares including taxes and fees; including fares greater than \$25.



Delta is the Most Expensive U.S. Airline

Airline	Price per mile (stage-length adjusted)*	Overall position
Delta Air Lines	22.8	1
American Airlines	22.3	2
United Airlines	21.1	3

*Price per mile (yield) is passenger revenue divided by the passenger's O&D distance. Prices per mile are stage-length adjusted to 1,456 miles (Alaska's average passenger domestic O&D distance).

Source: U.S. DOT DB1B Database, 2023. Includes domestic fares greater than \$500, taxes and fees.



Alaska's DCA-SEA service satisfies demand, while Delta's DCA-SLC high-fare service falls short

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Carrier	Origin	Destination	Passengers per day	Seats
Alaska	DCA	SEA	271	318
Delta	DCA	SLC	259	194

**COMMENTS OF FRONTIER AIRLINES, INC.,
ON TIMELY-FILED APPLICATIONS (JULY 17, 2024),
DOT-OST-2024-0065-22195**

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

**Application of
FRONTIER AIRLINES, INC.**

**For Slot Exemption at Ronald Reagan
Washington National Airport Pursuant to
49 U.S.C. § 41718**

Docket DOT-OST-2024-0065

COMMENTS ON TIMELY-FILED APPLICATIONS

Communications concerning this document should be sent to:

Howard M. Diamond
EVP, Legal and Corporate Affairs
Frontier Airlines
4545 Airport Way
Denver, CO 80239
Tel. 720-374-4367
E-mail: Howard.Diamond@flyfrontier.com

Brian E. Foont
The Foont Law Firm, LLC
11727 Gainsborough Road
Potomac, MD 20854
Tel. 202-236-4851
E-Mail: Foont@FoontLaw.com

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

**Application of
FRONTIER AIRLINES, INC.**

**For Slot Exemption at Ronald Reagan
Washington National Airport Pursuant to
49 U.S.C. § 41718**

Docket DOT-OST-2024-0065

COMMENTS ON TIMELY-FILED APPLICATIONS

I. Background

The U.S. Department of Transportation (DOT)'s Slot Exemption Proceeding at Ronald Reagan Washington National Airport Pursuant to 49 U.S.C. § 41718 issued June 24, 2024 (“Notice”),¹ called for applications for ten (10) slots (5 slot pairs) for use in the operation of daily flights from Ronald Reagan Washington National Airport (DCA). Subject to other qualifications, four (4) of the slot pairs are to be allocated to non-limited incumbent carriers and one (1) slot pair to a limited incumbent carrier. Three (3) carriers have applied in that latter category: Alaska Airlines, Inc. (“Alaska”), Spirit Airlines, Inc. (“Spirit”), and Frontier Airlines, Inc. (“Frontier”). Only Frontier, however, is eligible to receive the slot pair to be allocated to a limited incumbent carrier.

II. Spirit Airlines

In its application, seemingly to justify its eligibility, Spirit quotes from the Background section of Notice (emphasis added):

The Securing Growth and Robust Leadership in American Aviation Act of 2024, known as the FAA Reauthorization Act of 2024 (FAA 2024), directs the

¹ Docket DOT-OST-2024-0065-0001.

Department to grant “10 exemptions in two categories: eight exemptions, or four round trips, are reserved for **incumbent carriers** qualifying as non-limited incumbent carriers, and **two exemptions, or one round trip, are reserved for limited incumbent carriers.**”²

This appears to suggest that “incumbent carriers” modifies “non-limited incumbent carriers” but not “limited incumbent carriers.” Even if that were a reasonable interpretation, it disregards the section of the Notice on Eligibility that makes clear that “incumbent carrier” modifies both non-limited incumbent carriers and limited incumbent carriers (emphasis added):

FAA 2024 directs the Department to make eight of the 10 additional slot exemptions available to incumbent air carriers qualifying for status as a non-limited incumbent carrier at DCA as of the date of the enactment of the statute. The remaining two slot exemptions shall be made available to **incumbent air carriers qualifying for status as a limited incumbent carrier at DCA as of the date of the enactment of the statute**, and as defined by 49 U.S.C. § 41714(h)(5).³

The above Notice language accurately reflects the statute (emphasis added):

LIMITED INCUMBENTS.—Of the slot exemptions made available under paragraph (1), the Secretary shall make 2 available to **incumbent air carriers qualifying for status as a limited incumbent carrier at Ronald Reagan Washington National Airport as of the date of enactment of the FAA Reauthorization Act of 2024.**⁴

The statute and the Notice are clear: to receive a slot pair, the applying carrier must be an incumbent air carrier, *i.e.*, operating at DCA. Without that, the carrier is not eligible even if it happens to be a limited incumbent carrier. As Spirit’s counsel notes, Spirit “does not currently operate or market flights at DCA.”⁵ Spirit is, therefore, not an incumbent air carrier at DCA and, consequently, ineligible to receive slots under FAA 2024.

² Application of Spirit Airlines, Inc. for Two Slot Exemptions for DCA-SJC Service (Docket DOT-OST-2024-0065-5921) (quoting the Notice at 1).

³ Notice at 3.

⁴ 49 U.S.C. § 41718(i)(3).

⁵ Docket DOT-OST-2024-0065-0007 at 2.

III. Alaska Airlines

In its application, seemingly to justify its eligibility, Alaska asserts in a footnote:

This application responds to the Department's Notice served June 24, 2024 in the above-captioned docket (the "Notice"). As the Department stated in the Notice, Alaska is eligible to apply for an allocation of two slot exemptions as a limited incumbent carrier. See Notice at 2.⁶

The above, however, does not accurately reflect what the Notice says. Rather, it says:

The Department, in coordination with the FAA Slot Administration Office, is providing below a list of current DCA Non-Limited and Limited Incumbent carriers at the time of the enactment of FAA 2024.⁷

The DOT only shared a list of non-limited incumbent carriers and limited incumbent carriers at DCA.⁸ It said nothing concerning their being eligible to receive slots in this proceeding. By way of example, Air Canada is also listed among the limited incumbent carriers. The slots being distributed, however, must be used to provide service to a U.S. domestic airport from DCA.⁹ Thus, while Air Canada may be correctly listed as a limited incumbent carrier, being a foreign carrier, it is not permitted to provide domestic service from DCA. It is, therefore, ineligible and did not apply to receive any of the slot exemptions in the present proceeding.

Likewise, Alaska may be a limited incumbent carrier, but as Spirit's counsel correctly explains in a letter to DOT:

Consistent with two decades of Department precedent, 49 U.S.C. § 41714(k) expressly prohibits Alaska from qualifying as a limited incumbent for new slot exemptions because it has an ongoing codeshare agreement with American Airlines

⁶ Application of Alaska Airlines, Inc. for Slot Exemptions, Docket DOT-OST-2024-0065-5926 at note 1.

⁷ Notice at 2.

⁸ See, *infra*, Section IV (concerning an omission from that list).

⁹ 49 U.S.C. § 41718(i)(1)(A).

and the “total number of slots and slot exemptions held by the two carriers at the airport exceed 20.”^{10, 11}

That statute provides:

Affiliated Carriers.—

For purposes of this section and sections 41716, 41717, and 41718, an air carrier that operates under the same designator code, or has or enters into a code-share agreement, with any other air carrier shall not qualify for a new slot or slot exemption as a new entrant or limited incumbent air carrier at an airport if the total number of slots and slot exemptions held by the two carriers at the airport exceed 20 slots and slot exemptions.

The provisions of FAA 2024 establishing the slots that are the subject of the Notice and this proceeding were added to 49 U.S.C. § 41718, which is one of the three (3) sections of the U.S. Code referenced in the above statute. There is, therefore, no question that 49 U.S.C. § 41714(k) applies in determining Alaska’s eligibility to bid. Because American Airlines is a non-limited incumbent carrier,¹² when combined with Alaska, “the total number of slots and slot exemptions held by the two carriers at the airport exceed 20 slots and slot exemptions.” Thus, Alaska does not “qualify for a new slot or slot exemption as a new entrant or limited incumbent air carrier.”

¹⁰ Docket DOT-OST-2024-0065-0007 at 1. We note that in contrast to the definition of “limited incumbent air carrier” under 49 U.S.C. § 41714(h)(5), the rule under 49 U.S.C. § 41714(k) counts both “slots and slot exemptions” for the purposes of the limit of twenty (20) specified in that provision.

¹¹ See <https://www.alaskaair.com/content/travel-info/before-your-trip/codeshare-information> (page at Alaska Airlines’ website describing its code sharing relationships) (last visited 07/17/24) and <https://www.alaskaair.com/content/mileage-plan/how-to-earn-miles/airline-partners/american-airlines?lid=airline-partners:partners-american> (page at Alaska Airlines’ website describing its code sharing relationship with American Airlines) (last visited 07/17/24). That code sharing includes over fifty (50) flights operating from DCA each day.

¹² Notice at 2.

IV. Frontier Airlines

Frontier is: (i) an incumbent carrier at DCA, *i.e.*, it operates flights at DCA,¹³ (ii) a limited incumbent carrier,¹⁴ (iii) is not a party to a relationship that invokes 49 U.S.C. § 41714(k) addressed above, and (iv) as a domestic carrier may operate domestic flights.

Frontier noticed its omission from the table of Non-Limited Incumbent Carrier and Limited Incumbent Carriers in the Notice. We sought to understand the omission. By way of example, Spirit's omission makes sense in light of footnote 4 in the Notice, "This list includes only those carriers marketing air transportation at DCA on the date of enactment of FAA 2024." Spirit does not operate flights at DCA. Frontier, however, does operate flights at DCA, including "on the date of enactment of FAA 2024."

Moreover, noting that Alaska was included on the list of limited incumbent air carriers in the Notice (despite being excluded from eligibility under that status by a different part of the statute¹⁵), all of Frontier's DCA slots, like Alaska's, are exemption slots.¹⁶ We suggest that Frontier's omission from the list was an error.

V. Conclusion

In light of the above, we respectfully submit that Frontier is the only "incumbent air carrier[] qualifying for status as a limited incumbent carrier at Ronald Reagan Washington National Airport as of the date of enactment of the FAA Reauthorization Act of 2024."¹⁷ It,

¹³ Frontier presently operates three (3) daily trips on DCA-DEN (Denver International Airport).

¹⁴ See Frontier's Application for Slot Exemption, Docket DOT-OST-2024-0065-5802 at Section 2 (addressing Frontier's eligibility for the slot pair it is seeking).

¹⁵ See, *supra*, Section IV.

¹⁶ That is under an exemption from the perimeter rules that otherwise bar flights from DCA exceeding 1,250 miles (14 C.F.R. § 93.253). Specifically, Frontier utilizes three (3) slot pairs to operate flights on DCA-DEN, while Alaska utilizes five (5) slot pairs to operate one (1) daily flight to each of Los Angeles International Airport (LAX), Portland International Airport (PDX), San Francisco International Airport (SFO), and two (2) to Seattle-Tacoma International Airport (SEA).

¹⁷ 49 U.S.C. § 41718(i)(3).

therefore, looks forward to being granted a slot pair to operate daily flights from Ronald Reagan Washington National Airport (DCA) to/from Luis Muñoz Marín International Airport (SJU).

Respectfully submitted,



Brian E. Foont
Brian E. Foont
The Foont Law Firm, LLC
11727 Gainsborough Road
Potomac, MD 20854
Tel. 202-236-4851
E-Mail: Foont@FoontLaw.com

Counsel for Frontier Airlines, Inc.

July 17, 2024

CERTIFICATE OF SERVICE

I, Brian E. Foont, certify that on July 17, 2024, I caused a copy of Frontier Airlines, Inc.'s Comments On Timely-Filed Applications to be served upon the U.S. Department of Transportation via posting to Docket DOT-OST-2024-0065 at <http://www.regulations.gov>.


Brian E. Foont
Brian E. Foont

**ANSWER OF ALASKA AIRLINES, INC. (NOV. 8, 2024),
DOT-OST-2024-0065-23596**

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, DC**

Establishment of Slot Exemption Proceeding)
At Ronald Reagan Washington National Airport) Docket DOT-OST-2024-0065
Pursuant to 49 U.S.C. § 41718)
)

ANSWER OF ALASKA AIRLINES, INC.

Communications with respect to this document should be addressed to:

Kyle Levine
Senior Vice President,
Legal & General Counsel

Cameron Cloar-Zavaleta
Deputy General Counsel
& Managing Director,
Litigation & Regulatory Law

ALASKA AIRLINES, INC.

19300 International Boulevard
Seattle, Washington 98188

David Heffernan
Michael Deutsch
COZEN O'CONNOR
2001 M Street, NW
Washington, DC 20036
(202) 912-4800
dheffernan@cozen.com
mdeutsch@cozen.com

Counsel for
ALASKA AIRLINES, INC.

DATED: November 8, 2024

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, DC**

Establishment of Slot Exemption Proceeding)	
At Ronald Reagan Washington National Airport)	Docket DOT-OST-2024-0065
Pursuant to 49 U.S.C. § 41718)	
)	

ANSWER OF ALASKA AIRLINES, INC.

Alaska Airlines, Inc. (“Alaska”) responds to the objections of Spirit Airlines, Inc. (“Spirit”)¹ and Frontier Airlines, Inc. (“Frontier”)² to Order to Show Cause 2024-10-11 (“SCO”), in which DOT tentatively determined that Alaska is eligible for an allocation of slot exemptions, whereas Spirit and Frontier are not. DOT’s tentative decision to grant two slot exemptions to Alaska to provide daily nonstop roundtrip service between Ronald Reagan Washington National Airport (“DCA”) and San Diego International Airport (“SAN”) is correct under the clear requirements of the FAA Reauthorization Act of 2024 (“FAA 2024”).

Spirit’s and Frontier’s fundamental objection is that each exclusively qualifies for a slot exemption allocation as a “limited incumbent air carrier.” As explained below, however, DOT’s tentative decision regarding Alaska’s eligibility, and Spirit’s and Frontier’s ineligibility, for such an allocation is correct with respect to each carrier. Spirit’s and Frontier’s arguments are unpersuasive and not supported by applicable law. Alaska therefore urges DOT to expeditiously

¹ Objection of Spirit Airlines, Inc. to Order to Show Cause, Oct. 30, 2024 (Docket DOT-OST-2024-0065) (“Spirit Objection”).

² Objection of Frontier Airlines, Inc. to Order to Show Cause, Oct. 30, 2024 (Docket DOT-OST-2024-0065) (“Frontier Objection”).

Answer of Alaska Airlines, Inc.

Page 2

issue a final order confirming its selection so that Alaska can implement DCA-SAN service as soon as possible.

I. DOT is Correct That Neither Spirit Nor Frontier Qualifies for an Allocation of Slot Exemptions.

Section 502 of FAA 2024 directs DOT to allocate two slot exemptions as follows:

Limited Incumbents.—Of the slot exemptions made available …, the Secretary shall make 2 available to *incumbent air carriers* qualifying for status as a *limited incumbent* carrier at [DCA] as of [May 16, 2024].³

The congressional mandate is clear and DOT correctly interpreted it as requiring a “two-part test for eligibility” whereby (1) “a carrier must be an incumbent [air carrier] at DCA on” May 16, 2024, *i.e.*, it must have “provid[ed] air transportation” at the airport on that date,⁴ and (2) such a carrier must “also qualify for status as a limited incumbent [carrier]....”⁵ As explained below, DOT is correct in finding that Alaska satisfies both prongs of the test whereas Spirit and Frontier do not.

It is telling that Spirit’s 14-page objection to the SCO includes only two pages in which Spirit unavailingly attempts to establish its eligibility, which is the *sine qua non* for Spirit. Apparently frustrated by its indefensible legal position, Spirit lashes out, not merely arguing that DOT is “[in]correct” in deeming Spirit ineligible, but accusing DOT of acting “improperly” to achieve a “virtually pre-determined outcome.”⁶ Spirit also recklessly insinuates that the SCO is the product of a conspiracy between two branches of government and American, Delta,

³ 49 U.S.C. § 41718(i)(3) (emphasis added). May 16, 2024 is the date of enactment of FAA 2024.

⁴ DOT explained that “incumbent air carrier” is “not a defined term” under the relevant statute or regulations, and thus, relying “on a plain language reading of the statute,” properly defined “incumbent air carrier” as “a carrier that is engaged in air transportation as of the date of enactment of FAA 2024.” SCO at 19; *see also id.* (a carrier “providing air transportation at DCA on the date of enactment of FAA 2024” (*i.e.*, May 16, 2024)).

⁵ *Id.*

⁶ Spirit Objection at 3, 4; *see also id.* at 2 (“As if there was any doubt about which airlines would be selected....”).

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Southwest, and United, the four largest “legacy airlines which dominate domestic air transportation[,]” to effect a “giveaway” of slot exemptions to each of those carriers and Alaska.⁷ If Spirit had a plausible case for its statutory eligibility, it presumably would have devoted more time in its objection to that topic rather than denigrating the integrity of government officials. But it did not do so.

A. *Spirit is Not an Incumbent Carrier at DCA*

Spirit concedes that it did not “provid[e] air transportation at DCA” on May 16, 2024. Perhaps that is why Spirit ignores the statute’s crystal-clear language allocating slot exemptions only to “*incumbent carriers* qualifying for status as a limited incumbent carrier”⁸ Instead, Spirit claims that it qualifies for slot exemptions under section 502 *solely* on the basis that it meets the definition of a “limited incumbent carrier”⁹ (*i.e.*, that it can satisfy the test’s second prong). Spirit thus invites DOT to read section 502 as only involving a single-element test. The problem with Spirit’s argument is that it would require DOT to ignore and effectively eradicate from the statutory text of section 502 the words “...incumbent air carriers qualifying for status as...” If Congress wanted to enact a provision reflecting Spirit’s interpretation, it could have simply excluded that phrase from section 502. Put another way, Congress could have directed DOT to make 2 slot exemptions available to a carrier meeting the definition of limited incumbent

⁷ *Id.* at 2-3. Spirit even castigates Senator Cantwell, Chair of the Senate Committee on Commerce, Science and Transportation, for allegedly having “instruct[ed]” DOT to select Alaska. *Id.* at 2, 8 n.10 (DOT “may feel compelled by Senator Cantwell’s letter of instruction” to select Alaska). Spirit fails to recognize that, far from issuing an instruction, the Senator simply emphasized that “[t]o be sure, section 502 was intended to provide direct access to DCA from unserved beyond perimeter locations in the western and southwestern United States, such as San Antonio and San Diego.” She also referenced Seattle and Las Vegas as examples of other western cities that would benefit from new DCA service. Letter of Sen. Maria Cantwell to DOT Secretary Pete Buttigieg, dated July 17, 2024 (Docket DOT-OST-2024-0065).

⁸ 49 U.S.C. § 41718(i)(3) (emphasis added).

⁹ See 14 C.F.R. § 93.213(a)(5), 49 U.S.C. § 41714(h)(5).

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carrier even if that carrier did not “provide” air transportation at DCA on May 16, 2024.

Congress, however, did not do that, and DOT must faithfully apply Congress’ mandate that only carriers that were incumbent air carriers at DCA on May 16, 2024 are eligible for an allocation of slot exemptions in this case.¹⁰ Thus, DOT correctly concluded that Spirit “is ineligible for an award in this proceeding.”¹¹

Spirit strains to rationalize away the actual meaning and effect of the complete text of section 502. It argues that if Congress wanted to limit eligibility to carriers that operated flights at DCA on May 16, 2024, it would have referred to “operating carriers,” using that phrase as essential “qualifying words” (rather than “incumbent air carriers”).¹² This argument is fatally flawed, first, in its assumption that legislative drafting is always so specific and consistent in terms of word choice that Congress invariably “knows precisely what to say” or that the only way for Congress to so say would be to use a term that Spirit alone deems to be “qualifying words.”

Second, Spirit is simply wrong in claiming that “operating carrier” is a universal term of reference or “qualifying words.” On the contrary, 49 U.S.C. § 40102, which contains a litany of statutory definitions of key terms in the Aviation Code, contains no reference whatsoever to “operating carrier.” Indeed, the statutory definition of “air carrier” refers to a carrier that

¹⁰ Spirit accuses DOT of having “improperly concocted a new eligibility criterion from whole cloth never intended or passed by Congress.” Spirit Objection at 8. DOT, however, did nothing of the sort. On the contrary, DOT’s interpretation recognizes and applies a clause in the statutory text, whereas Spirit’s interpretation, by contrast, would disregard that clause for Spirit’s expediency.

¹¹ SCO at 21.

¹² Spirit Objection at 10 (“Congress knows precisely what to say when it wants to refer to an operating carrier and the chosen word is ‘operates’”).

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“provides air transportation.”¹³ That definition supports DOT’s interpretation here of “incumbent air carrier” as one that “provid[ed] air transportation at DCA on” May 16, 2024.¹⁴

B. Frontier is Not a Limited Incumbent Carrier at DCA

Like Spirit, Frontier cannot satisfy both prongs of the test. Frontier satisfies the first prong as it was an “incumbent air carrier” at DCA on May 16, 2024 (when it operated three roundtrip flights using slot exemptions). DOT correctly determined, however, that Frontier fails the test’s second prong because it is not a “limited incumbent air carrier” and thus is “ineligible to apply for slot exemptions in this proceeding.”¹⁵

As DOT noted, the statute (section 41714(h)(5)(B)) defines “limited incumbent air carrier” by reference to 14 C.F.R. § 93.213 as “an air carrier or commuter operator that holds or operates fewer than 40 air carrier or commuter slots, in any combination” at DCA, while “exclud[ing] an air carrier’s count of slot exemptions at DCA for purposes of determining a carrier’s status as a limited incumbent air carrier in order to allocate slot exemptions at DCA.”¹⁶ Frontier acknowledges that “[b]ecause all of Frontier’s slots are slot exemptions, that reduces [Frontier’s] total to zero (0).”¹⁷

Frontier’s effort to qualify as a “limited incumbent air carrier” rests on a single proposition: that a carrier such as Frontier that holds zero slots (excluding slot exemptions) at DCA is nonetheless a “limited incumbent air carrier” on the basis that zero slots is fewer than 40 slots. DOT’s response to this argument is succinct and incontrovertible: although Frontier may

¹³ 49 U.S.C. § 40102(a)(2) (emphasis added).

¹⁴ SCO at 19.

¹⁵ *Id.* at 20.

¹⁶ *Id.*

¹⁷ Frontier Objection at 12.

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qualify as a new entrant air carrier (under section 41714(h)(3)), “Congress did not make any of the ten slot exemptions from FAA 2024 available to new entrant air carriers.”¹⁸ DOT neatly encapsulated Frontier’s plight thus: “while § 41714(h)(3) states that limited incumbent carriers are also new entrant carriers, the reverse is not true, *i.e.*, all new entrant carriers are not limited incumbent carriers.”¹⁹ The statutory definitions of those two terms more than adequately support DOT’s conclusion.²⁰ If the terms “new entrant air carrier” and “limited incumbent carrier” were identical or interchangeable, Congress would not have created two different definitions. Thus, DOT correctly determined that “Frontier is ineligible to receive a slot exemption award.”²¹

II. DOT is Correct That Alaska Qualifies for an Allocation of Slot Exemptions.

Spirit and Frontier do not dispute that Alaska is an incumbent carrier at DCA, having operated service at the airport on May 16, 2024. They also do not question that Alaska meets the definition of “limited incumbent carrier” in 14 C.F.R. § 93.213(a)(5) as amended by 49 U.S.C. § 41714(h)(5). Rather, they argue that Alaska should be disqualified under a different statutory provision, section 41714(k), which states that:

For purposes of this section [41714] and sections 41716, 41717, and 41718, an air carrier that … has … a code-share agreement with any other air carrier shall not qualify for a new slot or slot exemption as a new entrant or limited incumbent air carrier at an airport if the total number of slots and slot exemptions held by the two carriers at the airport exceed 20 slots and slot exemptions.

¹⁸ SCO at 20.

¹⁹ *Id.* Frontier disputes that it is a new entrant (Frontier Objection at 9-10), but, per DOT’s comment, even if that were true, it would not further Frontier’s claim to be a limited incumbent carrier.

²⁰ See 49 U.S.C. § 41714(h)(3) (defining “new entrant air carrier” as “an air carrier that does not hold a slot at the airport concerned and has never sold or given up a slot at that airport after December 16, 1985, and a limited incumbent carrier”); but see 49 U.S.C. § 41714(h)(5) (defining “limited incumbent air carrier” without including new entrant air carriers).

²¹ SCO at 20.

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The sole focus of this objection is that Alaska has a codeshare agreement with American Airlines, Inc. (“American”) and that if Alaska’s modest DCA slot holdings were combined with American’s much larger holdings at the airport, the combined number would exceed 20 slots. As DOT correctly recognized, however, Alaska does not display American’s code “on any nonstop flight it operates at DCA, and it would not be permitted to do so for any service operated with a new slot exemption award.”²²

The crux of Spirit’s and Frontier’s argument is that the “broad,” “unambiguous” and “plain” text of section 41714(k) compels DOT to disqualify Alaska from eligibility without regard to context (*e.g.*, as a legal matter, how the provision relates to the overall DCA slot-related statutory scheme and, as a factual matter, how Alaska does and does not engage in codesharing with American at that airport).²³ As Spirit’s and Frontier’s subjective reading of section 41714(k) demonstrates, “plain meaning” is in the eye of the beholder and context not only matters but U.S. Supreme Court precedent (including as cited by Frontier) compels its consideration.

Frontier appropriately cites the U.S. Supreme Court’s 2015 decision in *King v Burwell*, in which the Court held that: “If the statutory language is plain, we must enforce it according to its terms.”²⁴ The Court, however, did not stop there, but rather continued (using language Frontier selectively omitted in its quotation from the case):

But oftentimes the ‘meaning—or ambiguity—of certain words or phrases may only become evident when placed in context. So when deciding whether the language is plain, we must read the words ‘in their context and with a view to

²² SCO at 21-22 (citing a legally binding settlement agreement between Alaska and the U.S. Department of Justice that prohibits the display of American’s code on Alaska flights to or from DCA).

²³ Spirit Objection at 6; Frontier Objection at 4.

²⁴ *King v. Burwell*, 576 U.S. 473, 486 (2015), *citing* *Hardt v. Reliance Standard Life Ins. Co.*, 560 U.S. 242, 251 (2010).

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their place in the overall statutory scheme.’ ***Our duty, after all, is ‘to construe statutes, not isolated provisions.’***²⁵

Thus, the language of section 41714(k) must be read, not in “isolat[ion],” but in the context of the “overall statutory scheme,” particularly because the provision begins: “For purposes of this section [41714] and … section 41718.” Section 41714 is titled “Availability of Slots,” while section 41718 is titled “Special Rules for Ronald Reagan Washington National Airport.” Thus, Congress and the Supreme Court require that section 41714(k) be read in context and with reference to the “overall statutory scheme” governing slots at DCA.

Congress, in adopting section 41714(k), was emphatic about that context and the provision’s purpose. As then-Senate Commerce Committee Chair John McCain stated on the Senate floor:

Let me be perfectly clear what this provision means. A major airline should not be allowed to game the system and add to its hundreds of daily slots through its commuter affiliates and codeshare partners.²⁶

Senators Charles Grassley and Tom Harkin, “two of the principal architects” of the legislation, later reinforced Senator McCain’s “perfectly clear” point: “The clear intent of Congress was to keep the major airlines from gaming the system to the detriment of new entrant airlines specifically and airline competition generally.”²⁷

The “context” in this case is that although Alaska has a codeshare agreement with American, Alaska does not display American’s code on any of Alaska’s flights at DCA, nor will

²⁵ *King*, 576 U.S. at 486, quoting *FDA v. Brown & Williamson Tobacco Corp.*, 529 U.S. 120, 133 (2000), *Graham County Soil & Water Conservation Dist. v. United States ex rel. Wilson*, 559 U.S. 280, 290 (2010) (bolded and italicized text was omitted from Frontier’s quotation from the case); see also *King*, 576 U.S. at 492 (referencing “the fundamental canon of statutory construction that the words of a statute must be read in their context and with a view to their place in the overall statutory scheme”) (internal citation omitted).

²⁶ Letter from Senators Charles E. Grassley and Tom Harkin to DOT Secretary Rodney Slater, Nov. 14, 2000, quoting statement of Senator John McCain on Senate floor, Oct. 6, 1999 (attached as Exhibit hereto) (explaining the meaning and intent of section 41714(k)).

²⁷ *Id.*

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Alaska display American's code on Alaska's DCA-SAN flights.²⁸ Therefore, DOT was correct when it determined that section 41714(k) does not affect Alaska's eligibility because "Alaska is not a commuter air carrier and is not seeking to operate its proposed DCA-SAN service under the marketing control and branding of American."²⁹

III. Neither Frontier Nor Spirit Has Presented a Credible Case for an Allocation of Slot Exemptions.

Alaska has consistently refrained from commenting on the merits of Spirit's and Frontier's applications because that issue is moot when the applicant is ineligible to apply. It bears noting, however, that Frontier failed to file a complete application in accordance with the minimum requirements set forth in DOT's notice establishing this proceeding.³⁰ Therefore, even if Frontier were eligible to apply (which, as DOT has correctly determined, it is not), it would be subject to disqualification for its failure to provide even the minimum required information in support of its application.

²⁸ Spirit and Frontier argue that because Alaska places its code on American's flights at DCA, section 41714(k) acts as a bar to Alaska's eligibility as a limited incumbent carrier. That unilateral (as opposed to bilateral) codesharing, however, is fundamentally different from the type of codesharing that section 41714(k) is intended to address, *i.e.*, where a commuter or codeshare carrier that is a new entrant or limited incumbent procures slots to be operated on behalf of a non-limited incumbent carrier, typically through a capacity purchase arrangement. American is not "gaming the system" or "add[ing] to its hundreds of daily slots" via Alaska here; on the contrary, Alaska is seeking two slot exemptions to operate DCA-SAN service under its own code in competition with American and other carriers and will not place American's code on its DCA-SAN flights. *See* SCO at 21-22; Comments of Alaska Airlines, Oct. 30, 2024 (Docket DOT-OST-2024-0065) at 6-7.

²⁹ SCO at 22. Frontier misconstrues the statute and DOT's tentative decision when it claims that, were DOT to finalize the SCO, DOT would grant slot exemptions to Alaska by means of a "discretionary exemption" from section 41714(k). Frontier Objection at 4. On the contrary, DOT's tentative decision is based on its correct interpretation of section 41714(k).

³⁰ *See* Establishment of Slot Exemption Proceedings at Ronald Reagan Washington National Airport Pursuant to 49 U.S.C. § 41718, June 24, 2024 (Docket DOT-OST-2024-0065) ("DOT Notice"). The DOT Notice sets forth "minimum" requirements for submission of a complete application, including that an applicant identify the aircraft type it would use to provide its proposed service, "a schedule showing proposed times" and "an approximate start-up date." *Id.* at 3. Frontier's application contained none of this information. Application of Frontier Airlines, Inc. for Slot Exemption, July 8, 2024 (Docket DOT-OST-2024-0065).

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Spirit, meanwhile, is reportedly considering a bankruptcy filing or merger (or possibly both).³¹ It has applied for slot exemptions to initiate service between DCA, an airport it abandoned more than a decade ago after a history of service failure there, and San José Mineta International Airport (“SJC”), an airport where Spirit has very limited service and can offer no meaningful connections.³² This begs the question whether Spirit’s real objective is to add two slot exemptions to buttress its balance sheet regardless of whether its service proposal would enhance competition or travel options for consumers.³³

IV. Conclusion

Alaska urges DOT to expeditiously issue a final order confirming its tentative selection of Alaska so that Alaska can complete the additional steps necessary to begin daily nonstop roundtrip service between DCA and SAN as soon as possible.

[Signature Page Follows]

³¹ See Bloomberg, *Spirit Airlines Pursues Bankruptcy as a Path to Tie-Up With Frontier*, Oct. 23, 2024, available at <https://www.bloomberg.com/news/articles/2024-10-23/spirit-air-pursues-bankruptcy-as-a-path-to-tie-up-with-frontier>; AirlineGeeks, *Spirit to Furlough Over 300 Pilots as Losses Mount*, Oct. 30, 2024, available at <https://airlinegeeks.com/2024/10/30/spirit-to-furlough-over-300-pilots-as-losses-mount/>.

³² Spirit argues that “[t]he correct decision would have established non-stop service to a beyond perimeter airport that has none from DCA and would have made service available that would have a substantial competitive impact on a major market.” Spirit Objection at 4. By Spirit’s own criteria, however, DOT *did* make the correct decision in selecting Alaska because SAN (not SJC) is the largest beyond perimeter market and Alaska’s SAN service will generate far more substantial competitive and consumer benefits.

³³ As Alaska has explained in both this answer and its comments on the SCO, DOT’s legal interpretation that Alaska, but not Spirit or Frontier, is eligible to receive the two available limited incumbent slot exemptions is correct. If, as Spirit and Frontier urge, Alaska were to be deemed a non-limited incumbent carrier, due process would require that DOT restart this proceeding to afford Alaska the opportunity for consideration for an allocation of slot exemptions in the non-limited incumbent carrier category.

Respectfully submitted,



David Heffernan
Michael Deutsch
COZEN O'CONNOR
2001 M Street, NW
Washington, DC 20036
(202) 912-4800
dheffernan@cozen.com
mdeutsch@cozen.com

Counsel for
ALASKA AIRLINES, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing Answer of Alaska Airlines, Inc. by electronic mail upon the following:

Air Canada:	anita.mosner@hklaw.com
American Airlines:	molly.wilkinson@aa.com
Breeze Aviation Group, Inc.:	roncevert.almond@aa.com
Delta Air Lines:	brent.alex@aa.com
Frontier Airlines:	perkmann@cooley.com
JetBlue Airways:	chris.walker@delta.com
Southwest Airlines:	steven.seiden@delta.com
Spirit Airlines:	howard.diamond@flyfrontier.com
United Airlines:	foont@foontlaw.com
DOT/FAA:	robert.land@jetblue.com
	reese.davidson@jetblue.com
	leslie.abbott@wnco.com
	jyoung@yklaw.com
	dkirstein@yklaw.com
	dcrowell@yklaw.com
	aarshad@crowell.com
	steve.morrissey@united.com
	dan.weiss@united.com
	todd.homan@dot.gov
	peter.irvine@dot.gov
	kevin.bryan@dot.gov
	fahad.ahmad@dot.gov
	jason.horner@dot.gov
	albert.muldoon@dot.gov
	brett.kruger@dot.gov
	robert.finamore@dot.gov
	lawrence.fields@faa.gov



Michael Deutsch

DATED: November 8, 2024

United States Senate
WASHINGTON, DC 20510

November 14, 2000

The Honorable Rodney Slater
Secretary of Transportation
U.S. Department of Transportation
Docket Number FAA-2000-8278
400 Seventh Street, SW, Room Plaza 401
Washington, D.C. 20590

Dear Secretary Slater:

As two of the principal architects of the provisions governing takeoff and landing slots at New York's LaGuardia Airport contained in the Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (Air21), we are writing to express strong exception to your proposal to treat commuter affiliates of major airlines individually for purposes of the proposed slot lottery at LaGuardia. Simply put, treating commuter affiliates individually is directly contrary to the letter,

spirit, and intent of Air21 on this issue. The legislative history on this matter is ~~unambiguous~~. Both the Senate (S. 82) and House (H.R. 1000) passed versions of Air21 directed DOT, when allocating slots, to treat all ~~commuter~~ carriers (e.g., American Eagle, United Express, etc.) equally. In explaining the intent of this provision, Senate Commerce Committee Chairman John McCain stated on the Senate floor, "Let me be perfectly clear about what this provision means. A major airline should not be allowed to game the system and add to its hundreds of daily slots through its ~~commuter~~ affiliates and code-share partners." (October 6, 1999)

In Air21, the Senate and House ultimately agreed to exempt major carriers regional jet service to small and nonhub airports to the slot controlled airports in New York and Chicago. As a result, the issue addressed by the ~~commuter~~ affiliates language became moot. However, recognizing that this issue was still relevant in terms of determining which carriers were new entrants, the Senate and House conference, which included Senator Grassley, included the following language in Section 231 of Air 21: "Affiliated Carriers: For purposes of this section and sections 41716, 41717, and 41718, an air carrier that operates under the same designator code, or has or enters into a code-share agreement, with any other air carrier shall not qualify for a new entrant slot or slot exemption as a new entrant or limited incumbent air carrier at an airport if the total number of slots and slot exemptions held by the 2 carriers at the airport exceed 20 slots and slot exemptions."

The clear intent of Congress was to keep the major airlines from gaming the system to the detriment of new entrant airlines specifically and airline competition generally. However, FAA's proposed lottery method allows some major carriers to do just that. Currently, there are 13 air carriers (9 new entrants and 4 major carriers) operating Air21 slots at LaGuardia. However,

despite the history, intent, and language of Air21, FAA would allow 17 participants in the lottery because some of the major carriers have more than one commuter affiliate operating its service.

As a result of FAA's allowing major carriers to artificially add participants in the lottery, new entrant carriers will not only have less opportunity to secure slots during the lottery but their ability to get competitive slot times is greatly reduced. Let us be very specific. Midwest Express Airlines currently operates twice daily direct service between Des Moines, Iowa, and LaGuardia using four Air21 slots. FAA's proposal envisions Midwest Express handing those slots back to FAA to be part of the lottery. While Midwest Express will likely get enough slots back via the lottery to continue its current Des Moines service, it is unlikely that it will obtain the exact slot times it is currently operating. As such, Des Moines consumers most likely will have flight departure and arrival times at LaGuardia that are inferior to what they have today. Allowing major carriers to game the system through their commuter affiliates greatly increases this possibility, and thus is completely unacceptable.

In order to adhere to Congressional intent and to promote airline competition, we respectfully request that you treat each major airline as a single entity in the lottery, regardless of how many commuter affiliates it has operating into LaGuardia.



Charles E. Grassley
United States Senate



Tom Harkin
United States Senate